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10 CFR 50.90

March 27, 2017
GO2-17-062

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
LICENSE AMENDMENT REQUEST TO REVISE TECHNICAL
SPECIFICATIONS TO ADOPT TSTF-523, REVISION 2**

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Energy Northwest is submitting a request for an amendment to the Technical Specifications (TS) for Columbia Generating Station (Columbia).

The proposed amendment would modify TS requirements to address Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," as described in TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

- Attachment 1 provides a description of the proposed change.
- Attachment 2 provides the existing TS pages marked up to show the proposed change.
- Attachment 3 provides revised (clean) TS pages.
- Attachment 4 provides existing TS Bases pages marked to show the proposed change. Changes to the existing TS Bases, consistent with the technical and regulatory analyses, will be implemented under the Technical Specification Bases Control Program. They are provided in Attachment 4 for information only.

Energy Northwest requests approval of the proposed License Amendment within one year of the date of this letter with the amendment being implemented within 60 days thereafter.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Washington State Official.

There are no new regulatory commitments contained in this request.

If you should have any questions regarding this submittal, please contact Ms. L.L. Williams, Licensing Supervisor, at 509-377-8148.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of March, 2017.

Respectfully,



A.L. Jayorik
Vice President, Engineering

Attachments: As stated

- cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
CD Sonoda - BPA - 1399 (email)
WA Horin - Winston & Strawn (email)
RR Cowley - WDOH (email)
JO Luce - EFSEC (email)

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed change revises or adds Surveillance Requirements (SRs) to verify that the system locations susceptible to gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification. The changes are being made to address the concerns discussed in Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems."

The proposed amendment is consistent with Technical Specification Task Force (TSTF) TSTF-523, Revision 2, "Generic Letter 2008-01, Managing Gas Accumulation."

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Energy Northwest has reviewed the model safety evaluation dated January 15, 2014, as part of the Federal Register Notice of Availability. This review included a review of the Nuclear Regulatory Commission (NRC) staff's evaluation, as well as the information provided in TSTF-523. As described in the subsequent paragraphs, Energy Northwest has concluded that the justifications presented in the TSTF-523 proposal and the model safety evaluation prepared by the NRC staff are applicable to Columbia Generating Station (Columbia) and justify this amendment for the incorporation of the changes to the Columbia Technical Specifications (TS).

2.2 Optional Changes and Variations

Energy Northwest is not proposing any significant variations or deviations from the TS changes described in the TSTF-523, Revision 2, or the applicable parts of the NRC staff's model safety evaluation dated January 15, 2014.

Columbia's TS utilize different numbering and titles than the Standard Technical Specifications (STS) on which TSTF-523 was based. Specifically, STS 3.6.1.7 "RHR Containment Spray System" is numbered TS 3.6.1.5 in the Columbia TS and is titled "RHR Drywell Spray". The TSTF-523 note added to STS SR 3.6.1.7.1 is not added to Columbia's SR 3.6.1.5.1 since it is not required due to the existing SR wording. Additionally, Columbia chose to add the new TSTF-523 SRs at the end of the surveillance requirements rather than renumbering the requirements.

These differences are administrative and do not affect the applicability of TSTF-523 to the Columbia TS.

Energy Northwest has implemented a Surveillance Frequency Control Program (License Amendment 238). The initial frequency of SR 3.4.9.2, SR 3.4.10.2, SR 3.6.1.5.3, SR 3.6.2.3.3, SR 3.9.8.2, and SR 3.9.9.2 will be 31 days.

Energy Northwest has submitted a License Amendment Request to adopt TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing." This change affects some of the same TS pages; however it does not affect the individual SRs being revised under TSTF-523. Thus, the two amendment requests are not linked.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Energy Northwest requests adoption of Technical Specification Task Force (TSTF) TSTF-523, Rev. 1, "Generic Letter 2008-01, Managing Gas Accumulation," which is an approved change to the standard technical specifications (STS), into the Columbia Technical Specifications (TS). The proposed change revises or adds Surveillance Requirements (SRs) to verify that the system locations susceptible to gas accumulation are sufficiently filled with water and to provide allowances which permit performance of the verification.

Energy Northwest has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change revises or adds SRs that require verification that the Emergency Core Cooling System (ECCS), Reactor Core Isolation Cooling (RCIC) System, Residual Heat Removal (RHR) Shutdown Cooling System, RHR Drywell Spray System, and RHR Suppression Pool Cooling System are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. Gas accumulation in the subject systems is not an initiator of any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The proposed SRs ensure that the subject systems continue to be capable to perform their assumed safety function and are not rendered inoperable due to gas accumulation. Thus, the consequences of any accident previously evaluated are not significantly increased.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change revises or adds SRs that require verification that the ECCS, RCIC System, RHR Shutdown Cooling System, RHR Drywell Spray System, and RHR Suppression Pool Cooling System are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the proposed change does not impose any new or different requirements that could initiate an accident. The proposed change does not alter assumptions made in the safety analysis and is consistent with the safety analysis assumptions.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change revises or adds SRs that require verification that the ECCS, RCIC System, RHR Shutdown Cooling System, RHR Drywell Spray System, and RHR Suppression Pool Cooling System are not rendered inoperable due to accumulated gas and to provide allowances which permit performance of the revised verification. The proposed change adds new requirements to manage gas accumulation in order to ensure the subject systems are capable of performing their assumed safety functions. The proposed SRs are more comprehensive than the current SRs and will ensure that the assumptions of the safety analysis are protected. The proposed change does not adversely affect any current plant safety margins or the reliability of the equipment assumed in the safety analysis. Therefore, there are no changes being made to any safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Energy Northwest concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.0 ENVIRONMENTAL EVALUATION

The proposed change does change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or does change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

GO2-17-062
Attachment 2

PROPOSED TECHNICAL SPECIFICATIONS CHANGES (MARK-UPS)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.9.2</p> <p>-----NOTE----- Not required to be performed until 12 hours after reactor steam dome pressure is < 48 psig. -----</p> <p>Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. No RHR shutdown cooling subsystem in operation. <u>AND</u> No recirculation pump in operation.	B.1 Verify reactor coolant circulating by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> B.2 Monitor reactor coolant temperature and pressure.	Once per hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.10.1 Verify one RHR shutdown cooling subsystem or recirculation pump is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.4.10.2 Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.1 Verify, for each ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water. the piping is filled with water from the pump discharge valve to the injection valve.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.1.2 -----NOTES----- - 1. Low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than 48 psig in MODE 3, if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flow paths opened under administrative control. ----- Verify each ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.1.3 Verify ADS accumulator backup compressed gas system average pressure in the required bottles is ≥ 2200 psig.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY												
<p>SR 3.5.2.3</p> <p>Verify, for each required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water. the piping is filled with water from the pump discharge valve to the injection valve.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>												
<p>SR 3.5.2.4</p> <p>-----NOTES----- --</p> <ol style="list-style-type: none"> 1. One low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flow paths opened under administrative controls. <p>-----</p> <p>Verify each required ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>												
<p>SR 3.5.2.5</p> <p>Verify each required ECCS pump develops the specified flow rate with the specified differential pressure between reactor and suction source.</p> <table border="1" data-bbox="483 1409 1170 1717"> <thead> <tr> <th><u>SYSTEM</u></th> <th><u>FLOW RATE</u></th> <th><u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u></th> </tr> </thead> <tbody> <tr> <td>LPCS</td> <td>≥ 6200 gpm</td> <td>≥ 128 psid</td> </tr> <tr> <td>LPCI</td> <td>≥ 7200 gpm</td> <td>≥ 26 psid</td> </tr> <tr> <td>HPCS</td> <td>≥ 6350 gpm</td> <td>≥ 200 psid</td> </tr> </tbody> </table>	<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u>	LPCS	≥ 6200 gpm	≥ 128 psid	LPCI	≥ 7200 gpm	≥ 26 psid	HPCS	≥ 6350 gpm	≥ 200 psid	<p>In accordance with the Inservice Testing Program</p>
<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u>											
LPCS	≥ 6200 gpm	≥ 128 psid											
LPCI	≥ 7200 gpm	≥ 26 psid											
HPCS	≥ 6350 gpm	≥ 200 psid											

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.3.1 Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water is filled with water from the pump discharge valve to the injection valve. is filled with water from the pump discharge valve to the injection valve.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.2 -----NOTE----- Not required to be met for system vent flow paths opened under administrative control. -----</p> <p>Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.3 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify, with reactor pressure ≤ 1035 psig and ≥ 935 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.4 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify, with reactor pressure ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.5.1	Verify each RHR drywell spray subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.5.2	Verify each spray nozzle is unobstructed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.5.3	Verify RHR drywell spray subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.2.3.1	Verify each RHR suppression pool cooling subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.2.3.2	Verify each RHR pump develops a flow rate ≥ 7100 gpm through the associated heat exchanger while operating in the suppression pool cooling mode.	In accordance with the Inservice Testing Program
SR 3.6.2.3.3	Verify RHR suppression pool cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.8.2	Verify required RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately
C. No RHR shutdown cooling subsystem in operation.	C.1 Verify reactor coolant circulation by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> C.2 Monitor reactor coolant temperature.	Once per hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.9.1 Verify one RHR shutdown cooling subsystem is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.9.9.2 Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

GO2-17-062
Attachment 3

PROPOSED TECHNICAL SPECIFICATION PAGES (CLEAN)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. No RHR shutdown cooling subsystem in operation.</p> <p><u>AND</u></p> <p>No recirculation pump in operation.</p>	<p>B.1 Initiate action to restore one RHR shutdown cooling subsystem or one recirculation pump to operation.</p> <p><u>AND</u></p> <p>B.2 Verify reactor coolant circulation by an alternate method.</p> <p><u>AND</u></p> <p>B.3 Monitor reactor coolant temperature and pressure.</p>	<p>Immediately</p> <p>1 hour from discovery of no reactor coolant circulation</p> <p><u>AND</u></p> <p>Once per 12 hours thereafter</p> <p>Once per hour</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.9.1 -----NOTE-----</p> <p>Not required to be met until 2 hours after reactor steam dome pressure is less than 48 psig.</p> <p>-----</p> <p>Verify one RHR shutdown cooling subsystem or recirculation pump is operating.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.9.2</p> <p>-----NOTE----- Not required to be performed until 12 hours after reactor steam dome pressure is < 48 psig. -----</p> <p>Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. No RHR shutdown cooling subsystem in operation. <u>AND</u> No recirculation pump in operation.	B.1 Verify reactor coolant circulating by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> B.2 Monitor reactor coolant temperature and pressure.	Once per hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.10.1 Verify one RHR shutdown cooling subsystem or recirculation pump is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.4.10.2 Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.1 Verify, for each ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.1.2 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Low pressure coolant injection (LPCI) subsystems may be considered OPERABLE during alignment and operation for decay heat removal with reactor steam dome pressure less than 48 psig in MODE 3, if capable of being manually realigned and not otherwise inoperable. 2. Not required to be met for system vent flow paths opened under administrative control. <p>-----</p> <p>Verify each ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.1.3 Verify ADS accumulator backup compressed gas system average pressure in the required bottles is ≥ 2200 psig.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE			FREQUENCY
SR 3.5.1.4	Verify each ECCS pump develops the specified flow rate with the specified differential pressure between reactor and suction source.		In accordance with the Inservice Testing Program
		<u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u>	
	<u>SYSTEM</u> <u>FLOW RATE</u>		
	LPCS ≥ 6200 gpm	≥ 128 psid	
	LPCI ≥ 7200 gpm	≥ 26 psid	
	HPCS ≥ 6350 gpm	≥ 200 psid	
SR 3.5.1.5	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>		In accordance with the Surveillance Frequency Control Program
SR 3.5.1.6	<p>-----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>		In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.7</p> <p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each required ADS valve opens when manually actuated.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.1.8</p> <p>-----NOTE----- ECCS actuation instrumentation is excluded. -----</p> <p>Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY												
SR 3.5.2.3	Verify, for each required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program												
SR 3.5.2.4	<p>-----NOTES-----</p> <ol style="list-style-type: none"> One low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. Not required to be met for system vent flow paths opened under administrative controls. <p>-----</p> <p>Verify each required ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	In accordance with the Surveillance Frequency Control Program												
SR 3.5.2.5	<p>Verify each required ECCS pump develops the specified flow rate with the specified differential pressure between reactor and suction source.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th><u>SYSTEM</u></th> <th><u>FLOW RATE</u></th> <th><u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u></th> </tr> </thead> <tbody> <tr> <td>LPCS</td> <td>≥ 6200 gpm</td> <td>≥ 128 psid</td> </tr> <tr> <td>LPCI</td> <td>≥ 7200 gpm</td> <td>≥ 26 psid</td> </tr> <tr> <td>HPCS</td> <td>≥ 6350 gpm</td> <td>≥ 200 psid</td> </tr> </tbody> </table>	<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u>	LPCS	≥ 6200 gpm	≥ 128 psid	LPCI	≥ 7200 gpm	≥ 26 psid	HPCS	≥ 6350 gpm	≥ 200 psid	In accordance with the Inservice Testing Program
<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>DIFFERENTIAL PRESSURE BETWEEN REACTOR AND SUCTION SOURCE</u>												
LPCS	≥ 6200 gpm	≥ 128 psid												
LPCI	≥ 7200 gpm	≥ 26 psid												
HPCS	≥ 6350 gpm	≥ 200 psid												

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.3.1 Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.2 -----NOTE----- Not required to be met for system vent flow paths opened under administrative control. ----- Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.3 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----- Verify, with reactor pressure ≤ 1035 psig and ≥ 935 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.3.4 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----- Verify, with reactor pressure ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.5.1	Verify each RHR drywell spray subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.5.2	Verify each spray nozzle is unobstructed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.1.5.3	Verify RHR drywell spray subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.2.3.1	Verify each RHR suppression pool cooling subsystem manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.6.2.3.2	Verify each RHR pump develops a flow rate ≥ 7100 gpm through the associated heat exchanger while operating in the suppression pool cooling mode.	In accordance with the Inservice Testing Program
SR 3.6.2.3.3	Verify RHR suppression pool cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3 Initiate action to restore one standby gas treatment subsystem to OPERABLE status.	Immediately
	<p><u>AND</u></p> B.4 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately
C. No RHR shutdown cooling subsystem in operation.	C.1 Verify reactor coolant circulation by an alternate method. <p><u>AND</u></p> C.2 Monitor reactor coolant temperature.	1 hour from discovery of no reactor coolant circulation <p><u>AND</u></p> Once per 12 hours thereafter Once per hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.8.1 Verify one RHR shutdown cooling subsystem is operating.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.9.8.2	Verify required RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately
C. No RHR shutdown cooling subsystem in operation.	C.1 Verify reactor coolant circulation by an alternate method.	1 hour from discovery of no reactor coolant circulation <u>AND</u> Once per 12 hours thereafter
	<u>AND</u> C.2 Monitor reactor coolant temperature.	Once per hour

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.9.1 Verify one RHR shutdown cooling subsystem is operating.	In accordance with the Surveillance Frequency Control Program
SR 3.9.9.2 Verify RHR shutdown cooling subsystem locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program

GO2-17-062
Attachment 4

PROPOSED TECHNICAL SPECIFICATION BASES PAGES (MARK-UPS)

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.9 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

BASES

BACKGROUND	<p>Irradiated fuel in the shutdown reactor core generates heat during the decay of fission products and increases the temperature of the reactor coolant. This decay heat must be removed to reduce the temperature of the reactor coolant to $\leq 200^{\circ}\text{F}$ in preparation for performing Refueling or Cold Shutdown maintenance operations, or the decay heat must be removed for maintaining the reactor in the Hot Shutdown condition.</p> <p>The two redundant, manually controlled shutdown cooling subsystems of the RHR System provide decay heat removal. Each loop consists of a motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Standby Service Water System (LCO 3.7.1, "Standby Service Water (SW) System and Ultimate Heat Sink (UHS)").</p>
APPLICABLE SAFETY ANALYSES	<p>Decay heat removal by the RHR System in the shutdown cooling mode is not required for mitigation of any event or accident evaluated in the safety analyses. Decay heat removal is, however, an important safety function that must be accomplished or core damage could result. The RHR Shutdown Cooling System meets Criterion 4 of Reference 1.</p>
LCO	<p>Two RHR shutdown cooling subsystems are required to be OPERABLE, and, when no recirculation pump is in operation, one shutdown cooling subsystem must be in operation. An OPERABLE RHR shutdown cooling subsystem consists of one OPERABLE RHR pump, one heat exchanger, and the associated piping and valves. Each shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. In MODE 3, one RHR shutdown cooling subsystem can provide the required cooling, but two subsystems are required to be OPERABLE to provide redundancy. Operation of one subsystem can maintain or reduce the reactor coolant temperature as required. However, to ensure adequate core flow to allow for accurate average reactor coolant temperature monitoring, nearly continuous operation is required. Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.</p>

BASES

ACTIONS (continued)

B.1, B.2, and B.3

With no RHR shutdown cooling subsystem and no recirculation pump in operation, except as is permitted by LCO Note 1, reactor coolant circulation by the RHR shutdown cooling subsystem or one recirculation pump must be restored without delay.

Until RHR or recirculation pump operation is re-established, an alternate method of reactor coolant circulation must be placed into service. This will provide the necessary circulation for monitoring coolant temperature. The 1 hour Completion Time is based on the coolant circulation function and is modified such that the 1 hour is applicable separately for each occurrence involving a loss of circulation. Furthermore, verification of the functioning of the alternate method must be reconfirmed every 12 hours thereafter. This will provide assurance of continued temperature monitoring capability.

During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem or recirculation pump), the reactor coolant temperature and pressure must be periodically monitored to ensure proper function of the alternate method. The once per hour Completion Time is deemed appropriate.

SURVEILLANCE
REQUIREMENTS

SR 3.4.9.1

This Surveillance verifies that one RHR shutdown cooling subsystem or recirculation pump is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This Surveillance is modified by a Note allowing sufficient time to align the RHR System for shutdown cooling operation after achieving less than 48 psig reactor steam dome pressure, or for placing a recirculation pump in operation. The Note takes exception to the requirements of the Surveillance being met (i.e., forced coolant circulation is not required for this initial 2 hour period), which also allows entry into the Applicability of this Specification in accordance with SR 3.0.4 since the Surveillance will not be "not met" at the time of entry into the Applicability.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.9.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR shutdown cooling subsystems and may also prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the

BASES

SURVEILLANCE REQUIREMENTS (continued)

susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

This SR is modified by a Note that states the SR is not required to be performed until 12 hours after reactor steam dome pressure is < 48 psig. In a rapid shutdown, there may be insufficient time to verify all susceptible locations prior to entering the Applicability.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

REFERENCES 1. 10 CFR 50.36(c)(2)(ii).

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.10 Residual Heat Removal (RHR) Shutdown Cooling System - Cold Shutdown

BASES

BACKGROUND

Irradiated fuel in the shutdown reactor core generates heat during the decay of fission products and increases the temperature of the reactor coolant. This decay heat must be removed to maintain the temperature of the reactor coolant at $\leq 200^{\circ}\text{F}$ in preparation for performing Refueling maintenance operations, or the decay heat must be removed for maintaining the reactor in the Cold Shutdown condition.

The two redundant, manually controlled shutdown cooling subsystems of the RHR System provide decay heat removal. Each loop consists of a motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Standby Service Water (SW) System.

APPLICABLE SAFETY ANALYSES

Decay heat removal by the RHR System in the shutdown cooling mode is not required for mitigation of any event or accident evaluated in the safety analyses. Decay heat removal is, however, an important safety function that must be accomplished or core damage could result. The RHR Shutdown Cooling System meets Criterion 4 of Reference 1.

LCO

Two RHR shutdown cooling subsystems are required to be OPERABLE, and, when no recirculation pump is in operation, one RHR shutdown cooling subsystem must be in operation. An OPERABLE RHR shutdown cooling subsystem consists of one OPERABLE RHR pump, one heat exchanger, one SW pump providing cooling to the heat exchanger, and the associated piping and valves. Each shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. In MODE 4, one RHR shutdown cooling subsystem can provide the required cooling, but two subsystems are required to be OPERABLE to provide redundancy. Operation of one subsystem can maintain and reduce the reactor coolant temperature as required. To ensure adequate core flow to allow for accurate average reactor coolant temperature monitoring, nearly continuous operation is required. [Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.](#)

Note 1 permits both RHR shutdown cooling subsystems and recirculation pumps to be shut down for a period of 2 hours in an 8 hour period.
Note 2 allows one RHR shutdown cooling subsystem to be inoperable for up to 2 hours for performance of Surveillance tests. These tests may be

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.10.1

This Surveillance verifies that one RHR shutdown cooling subsystem or recirculation pump is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.4.10.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR shutdown cooling subsystems and may also prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas

BASES

SURVEILLANCE REQUIREMENTS (continued)

intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

REFERENCES 1. 10 CFR 50.36(c)(2)(ii).

BASES

APPLICABLE SAFETY ANALYSES (continued)

- c. Maximum hydrogen generation from zirconium water reaction is ≤ 0.01 times the hypothetical amount that would be generated if all of the metal in the cladding surrounding the fuel, excluding the cladding surrounding the plenum volume, were to react;
- d. The core is maintained in a coolable geometry; and
- e. Adequate long term cooling capability is maintained.

The limiting single failures are discussed in Reference 11. For a large break LOCA, failure of ECCS subsystems in Division 1 (LPCS and LPCI A) or Division 2 (LPCI B and LPCI C) due to failure of its associated diesel generator is, in general, the most severe failure. For a small break LOCA, HPCS System failure is the most severe failure. The small break analysis also assumes two ADS valves are inoperable at the time of the accident. The remaining OPERABLE ECCS subsystems provide the capability to adequately cool the core and prevent excessive fuel damage.

The ECCS satisfy Criterion 3 of Reference 12.

LCO

Each ECCS injection/spray subsystem and six ADS valves are required to be OPERABLE. The ECCS injection/spray subsystems are defined as the three LPCI subsystems, the LPCS System, and the HPCS System. The low pressure ECCS injection/spray subsystems are defined as the LPCS System and the three LPCI subsystems. [Management of gas voids is important to ECCS injection/spray subsystem OPERABILITY.](#)

With less than the required number of ECCS subsystems OPERABLE during a limiting design basis LOCA concurrent with the worst case single failure, the limits specified in 10 CFR 50.46 (Ref. 10) could potentially be exceeded. All ECCS subsystems must therefore be OPERABLE to satisfy the single failure criterion required by 10 CFR 50.46 (Ref. 10).

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below 48 psig reactor steam dome pressure in MODE 3, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. Alignment and operation for decay heat removal includes when the required RHR pump is not operating or when the system is being realigned from or to the RHR shutdown cooling mode. At these low pressures and decay heat levels, a reduced complement of ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling when necessary.

BASES

SURVEILLANCE
REQUIREMENTSSR 3.5.1.1

The ECCS injection/spray subsystem flow path piping and components ~~have has~~ the potential to develop voids and pockets of entrained ~~airgases~~. ~~Maintaining the pump discharge lines of the HPCS System, LPCS System, and LPCI subsystems full of water ensures that the systems will perform properly, injecting their full capacity into the RCS upon demand. This will also p~~Preventing and managing gas intrusion and accumulation is necessary for proper operation of the ECCS injection/spray subsystems and may also prevent a water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel. ~~following an ECCS initiation signal. One acceptable method of ensuring the lines are full is to vent at the high points.~~

Selection of ECCS injection/spray subsystem locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The ECCS injection/spray subsystem is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the ECCS injection/spray subsystems are not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

ECCS injection/spray subsystem locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to

monitor the susceptible location. Monitoring is not required for
susceptible locations where the maximum potential accumulated gas void

BASES

SURVEILLANCE REQUIREMENTS (continued)

volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

SR 3.5.1.2

Verifying the correct alignment for manual, power operated, and automatic valves in the ECCS flow paths provides assurance that the proper flow paths will exist for ECCS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since these valves were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves potentially capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

In MODE 3 with the reactor steam dome pressure less than 48 psig, the RHR System may be required to operate in the shutdown cooling mode to remove decay heat and sensible heat from the reactor. Therefore, this SR is modified by a Note that allows LPCI subsystems to be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. Alignment and operation for decay heat removal includes when the required RHR pump is not operating or when the system is being realigned from or to the RHR shutdown cooling mode. At the low pressures and decay heat loads associated with operation in MODE 3 with reactor steam dome pressure less than 48 psig, a reduced complement of low pressure ECCS subsystems should provide the required core cooling, thereby allowing operation of RHR shutdown cooling, when necessary.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Surveillance is modified by a Note which exempts system vent flow paths opened under administrative control. The administrative control should be proceduralized and include stationing a dedicated individual at the system vent flow path who is in continuous communication with the operators in the control room. This individual will have a method to rapidly close the system vent flow path if directed.

SR 3.5.1.3

Verification that ADS accumulator backup compressed gas system average pressure in the required bottles is ≥ 2200 psig assures an adequate and OPERABLE air supply to the ADS valves. The minimum number of required bottles is 14 bottles in Division 1 and 17 in Division 2. The remote nitrogen cylinder connection in the DG corridor may be used to make up the minimum number of required bottles, provided the bottle(s) is properly installed to satisfy the seismic Category 1 restraint requirements and the bottle(s) capacity is greater than or equal to the capacity of the bottle being replaced. The nitrogen banks are sized to provide a 30 day supply of nitrogen for the ADS function. The ADS function is required to provide a flow path for alternate shutdown cooling. Alternate shutdown cooling is accomplished utilizing one RHR subsystem and the ADS to provide a path to the suppression pool for decay heat removal. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.1.4

The performance requirements of the ECCS pumps are determined through application of the 10 CFR 50, Appendix K, criteria (Ref. 8). This periodic Surveillance is performed (in accordance with the ASME OM Code requirements for the ECCS pumps) to verify that the ECCS pumps will develop the flow rates required by the respective analyses. The ECCS pump flow rates ensure that adequate core cooling is provided to satisfy the acceptance criteria of 10 CFR 50.46 (Ref. 10).

The pump flow rates are verified against a system pressure difference. For the LPCS and LPCI pumps the pressure difference is equivalent to that between the reactor and the suppression pool air volume. For the HPCS pump it is equivalent to the differential above the suction source (suppression pool or condensate storage tank). Under these conditions the total system pump outlet pressure is adequate to overcome the

B 3.5 EMERGENCY CORE COOLING SYSTEM (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

B 3.5.2 ECCS - Shutdown

BASES

BACKGROUND A description of the High Pressure Core Spray (HPCS) System, Low Pressure Core Spray (LPCS) System, and low pressure coolant injection (LPCI) mode of the Residual Heat Removal (RHR) System is provided in the Bases for LCO 3.5.1, "ECCS - Operating."

APPLICABLE SAFETY ANALYSES The ECCS performance is evaluated for the entire spectrum of break sizes for a postulated loss of coolant accident (LOCA). The long term cooling analysis following a design basis LOCA (Ref. 1) demonstrates that only one ECCS injection/spray subsystem is required, post LOCA, to maintain adequate reactor vessel water level in the event of an inadvertent vessel draindown. It is reasonable to assume, based on engineering judgement, that while in MODES 4 and 5, one ECCS injection/spray subsystem can maintain adequate reactor vessel water level. To provide redundancy, a minimum of two ECCS injection/spray subsystems are required to be OPERABLE in MODES 4 and 5.

The ECCS satisfy Criterion 3 of Reference 2

LCO Two ECCS injection/spray subsystems are required to be OPERABLE. The ECCS injection/spray subsystems are defined as the three LPCI subsystems, the LPCS System, and the HPCS System. The LPCS System and each LPCI subsystem consist of one motor driven pump, piping, and valves to transfer water from the suppression pool to the RPV. The HPCS System consists of one motor driven pump, piping, and valves to transfer water from the suppression pool or condensate storage tank (CST) to the RPV. The necessary portions of the Standby Service Water and HPCS Service Water Systems, as applicable, are also required to provide appropriate cooling to each required ECCS injection/spray subsystem. [Management of gas voids is important to ECCS injection/spray subsystem OPERABILITY.](#)

One LPCI subsystem (A or B) may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. Alignment and operation for decay heat removal includes when the RHR pump is not operating or when the system is being realigned from or to the RHR shutdown cooling mode. Because of low pressure and low temperature conditions in MODES 4 and 5, sufficient time will be available to manually align and initiate LPCI subsystem operation to provide core cooling prior to postulated fuel uncoverly.

BASES

SURVEILLANCE REQUIREMENTS (continued)

or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

In MODES 4 and 5, the RHR System may be required to operate in the shutdown cooling mode to remove decay heat and sensible heat from the reactor. Therefore, this SR is modified by a Note that allows one LPCI subsystem to be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. Alignment and operation for decay heat removal includes when the required RHR pump is not operating or when the system is being realigned from or to the RHR shutdown cooling mode. Because of the low pressure and low temperature conditions in MODES 4 and 5, sufficient time will be available to manually align and initiate LPCI subsystem operation to provide core cooling prior to postulated fuel uncover. This will ensure adequate core cooling if an inadvertent vessel draindown should occur.

The Surveillance is modified by a Note which exempts system vent flow paths opened under administrative control. The administrative control should be proceduralized and include stationing a dedicated individual at the system vent flow path who is in continuous communication with the operators in the control room. This individual will have a method to rapidly close the system vent flow path if directed.

REFERENCES

1. FSAR, Section 6.3.3.4.
 2. 10 CFR 50.36(c)(2)(ii).
 3. E/I-02-91-1011.
 4. E/I-02-98-1002.
 5. TM 2092.
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BASES

APPLICABLE SAFETY ANALYSES The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, however, the system satisfies Criterion 4 of Reference 3.

LCO The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity to maintain RPV inventory during an isolation event. [Management of gas voids is important to RCIC System OPERABILITY.](#)

APPLICABILITY The RCIC System is required to be OPERABLE in MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the ECCS injection/spray subsystems can provide sufficient flow to the vessel.

ACTIONS A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC system. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC system and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

A.1 and A.2

If the RCIC System is inoperable during MODE 1, or MODES 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCS System is immediately verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days. In this Condition, loss of the RCIC System will not affect the overall plant capability to provide makeup inventory at high RPV pressure since the HPCS System is the only high pressure system assumed to function during a loss of coolant accident (LOCA). OPERABILITY of the HPCS is therefore immediately verified when the RCIC System is inoperable. This may be performed as an administrative check, by examining logs or other information, to determine if the HPCS is out of service for maintenance or other reasons. Verification does not require performing the Surveillances needed to demonstrate the OPERABILITY of the HPCS System. If the OPERABILITY of the HPCS System cannot be immediately verified, however, Condition B must be immediately entered. For transients and

BASES

ACTIONS (continued)

certain abnormal events with no LOCA, RCIC (as opposed to HPCS) is the preferred source of makeup coolant because of its relatively small capacity, which allows easier control of RPV water level. Therefore, a limited time is allowed to restore the inoperable RCIC to OPERABLE status.

The 14 day Completion Time is based on a reliability study (Ref. 4) that evaluated the impact on ECCS availability, assuming that various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (AOTs). Because of the similar functions of the HPCS and RCIC, the AOTs (i.e., Completion Times) determined for the HPCS are also applied to RCIC.

B.1 and B.2

If the RCIC System cannot be restored to OPERABLE status within the associated Completion Time, or if the HPCS System is simultaneously inoperable, the plant must be brought to a condition in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and reactor steam dome pressure reduced to ≤ 150 psig within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.5.3.1

The RCIC System flow path piping and components have~~has~~ the potential to develop voids and pockets of entrained ~~air~~gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RCIC System and may also prevent a water hammer, pump cavitation, and pumping of noncondensable gas. ~~Maintaining the pump discharge line of the RCIC System full of water ensures that the system will perform properly, injecting its full capacity into the Reactor Coolant System upon demand. This will also prevent a water hammer following an initiation signal. One acceptable method of ensuring the line is full is to vent at the high points.~~

Selection of RCIC System locations susceptible to gas accumulation is based on a self-assessment of the piping configuration to identify where gases may accumulate and remain even after the system is filled and vented, and to identify vulnerable potential degassing flow paths. The review is supplemented by verification that installed high-point vents are

actually at the system high points, including field verification to ensure pipe shapes and construction tolerances have not inadvertently created additional high points. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The RCIC System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RCIC System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RCIC System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative sub-set of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

SR 3.5.3.2

Verifying the correct alignment for manual, power operated, and automatic valves in the RCIC flow path provides assurance that the proper flow path will exist for RCIC operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position since these were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an initiation signal is allowed to be in a

BASES

SURVEILLANCE REQUIREMENTS (continued)

nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. For the RCIC System, this SR also includes the steam flow path for the turbine and the flow controller position.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

The Surveillance is modified by a Note which exempts system vent flow paths opened under administrative control. The administrative control should be proceduralized and include stationing a dedicated individual at the system vent flow path who is in continuous communication with the operators in the control room. This individual will have a method to rapidly close the system vent flow path if directed.

SR 3.5.3.3 and SR 3.5.3.4

The RCIC pump flow rates ensure that the system can maintain reactor coolant inventory during pressurized conditions with the RPV isolated. The flow tests for the RCIC System are performed at two different pressure ranges such that system capability to provide rated flow against a system head corresponding to reactor pressure is tested both at the higher and lower operating ranges of the system. The required system head should overcome the RPV pressure and associated discharge line losses. Adequate reactor steam pressure must be available to perform these tests. Additionally, adequate steam flow must be passing through the main turbine or turbine bypass valves to continue to control reactor pressure when the RCIC System diverts steam flow. Therefore, sufficient time is allowed after adequate pressure and flow are achieved to perform these SRs. Adequate reactor steam pressure to perform SR 3.5.3.3 is 935 psig and to perform SR 3.5.3.4 is 150 psig. Adequate steam flow to perform SR 3.5.3.3 is represented by THERMAL POWER \geq 10% RTP and to perform SR 3.5.3.4 is represented by turbine bypass valves \geq 10% open. Reactor startup is allowed prior to performing the low pressure Surveillance because the reactor pressure is low and the time to satisfactorily perform the Surveillance is short. The reactor pressure is allowed to be increased to normal operating pressure since it is assumed that the low pressure test has been satisfactorily completed and there is no indication or reason to believe that RCIC is inoperable. Therefore,

BASES

SURVEILLANCE REQUIREMENTS (continued)

these SRs are modified by Notes that state the Surveillances are not required to be performed until 12 hours after the reactor steam pressure and flow are adequate to perform the test. The 12 hours allowed for the flow tests after the required pressure and flow are reached is sufficient to achieve stable conditions for testing and provides a reasonable time to complete the SRs.

The Surveillance Frequencies are controlled under the Surveillance Frequency Control Program.

SR 3.5.3.5

The RCIC System is required to actuate automatically to perform its design function. This Surveillance verifies that with a required system initiation signal (actual or simulated) the automatic initiation logic of RCIC will cause the system to operate as designed, including actuation of the system throughout its emergency operating sequence, automatic pump startup and actuation of all automatic valves to their required positions. This Surveillance test also ensures that the RCIC System will automatically restart on an RPV low water level (Level 2) signal received subsequent to an RPV high water level (Level 8) trip and that the suction is automatically transferred from the CST to the suppression pool. The LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.2 overlaps this Surveillance to provide complete testing of the assumed design function.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note that excludes vessel injection during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 33.
 2. FSAR, Section 5.4.6.2.
 3. 10 CFR 50.36(c)(2)(ii).
 4. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.
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BASES

APPLICABLE SAFETY ANALYSIS (continued)

The RHR drywell spray satisfies Criterion 3 of Reference 2.

LCO In the event of a Design Basis Accident (DBA), a minimum of one RHR drywell spray subsystem is required to mitigate the effects of potential bypass leakage paths and maintain the primary containment peak pressure below design limits. To ensure that these requirements are met, two RHR drywell spray subsystems must be OPERABLE. Therefore, in the event of an accident, at least one subsystem is OPERABLE assuming the worst case single active failure. An RHR drywell spray subsystem is OPERABLE when the pump and associated piping, valves, instrumentation, and controls are OPERABLE. [Management of gas voids is important to RHR Drywell Spray System OPERABILITY.](#)

APPLICABILITY In MODES 1, 2, and 3, a DBA (line break inside primary containment) could cause pressurization of primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining RHR drywell spray subsystems OPERABLE is not required in MODE 4 or 5.

ACTIONS

A.1

With one RHR drywell spray subsystem inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE RHR drywell spray subsystem is adequate to perform the primary containment bypass leakage mitigation function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced primary containment bypass leakage mitigation capability. The 7 day Completion Time was chosen in light of the redundant RHR drywell spray capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

B.1

With two RHR drywell spray subsystems inoperable, one subsystem must be restored to OPERABLE status within 8 hours. In this condition, there is a substantial loss of the primary containment bypass leakage mitigation function.

The 8 hour Completion Time is based on this loss of function and is considered acceptable due to the low probability of a DBA and because alternative methods to reduce primary containment pressure are available.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

A Note has been added to the SR. The Note exempts system vent flow paths opened under administrative control. The administrative control should be proceduralized and include stationing a dedicated individual at the system vent flow path who is in continuous communication with the operators in the control room. This individual will have a method to rapidly close the system vent flow path if directed.

SR 3.6.1.5.2

This Surveillance is performed to verify, by performance of an air or smoke flow test, that the spray nozzles are not obstructed and that flow will be provided when required. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.1.5.3

RHR Drywell Spray System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR suppression pool spray subsystems and may also prevent water hammer and pump cavitation.

Selection of RHR Drywell Spray System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Drywell Spray System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or

BASES

SURVEILLANCE REQUIREMENTS (continued)

discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Drywell Spray System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Drywell Spray System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative sub-set of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

REFERENCES

1. FSAR, Section 6.2.1.1.5.4.
 2. 10 CFR 50.36(c)(2)(ii).
 3. FSAR, Section 15.6.5.
 4. NEDC-32988-A, Revision 2, Technical Justification to Support Risk-Informed Modification to Selected Required End States for BWR Plants, December 2002.
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BASES

LCO During a DBA, a minimum of one RHR suppression pool cooling subsystem is required to maintain the primary containment peak pressure and temperature below the design limits (Ref. 2). To ensure that these requirements are met, two RHR suppression pool cooling subsystems must be OPERABLE. Therefore, in the event of an accident, at least one subsystem is OPERABLE, assuming the worst case single active failure. An RHR suppression pool cooling subsystem is OPERABLE when the pump, a heat exchanger, and associated piping, valves, instrumentation, and controls are OPERABLE. [Management of gas voids is important to RHR Suppression Pool Cooling System OPERABILITY.](#)

APPLICABILITY In MODES 1, 2, and 3, a DBA could cause both a release of radioactive material to primary containment and a heatup and pressurization of primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Therefore, the RHR Suppression Pool Cooling System is not required to be OPERABLE in MODE 4 or 5.

ACTIONS

A.1

With one RHR suppression pool cooling subsystem inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining RHR suppression pool cooling subsystem is adequate to perform the primary containment cooling function. However, the overall reliability is reduced because a single failure in the OPERABLE subsystem could result in reduced primary containment cooling capability. The 7 day Completion Time is acceptable in light of the redundant RHR suppression pool cooling capabilities afforded by the OPERABLE subsystem and the low probability of a DBA occurring during this period.

B.1

If one RHR suppression pool cooling subsystem is inoperable and is not restored to OPERABLE status within the required Completion Time, the plant must be brought to a condition in which overall plant risk is minimized. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours.

Remaining in the Applicability of the LCO is acceptable because the plant risk in MODE 3 is similar to or lower than the risk in MODE 4 (Ref. 5) and because the time spent in MODE 3 to perform the necessary repairs to restore the system to OPERABLE status will be short. However, voluntary entry into MODE 4 may be made as it is also an acceptable low-risk state.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.2.3.2

Verifying each RHR pump develops a flow rate ≥ 7100 gpm, while operating in the suppression pool cooling mode with flow through the associated heat exchanger, ensures that the primary containment peak pressure and temperature can be maintained below the design limits during a DBA (Ref. 2). The normal test of centrifugal pump performance required by the ASME OM Code (Ref. 4) is covered by the requirements of LCO 3.5.1, "ECCS - Operating." Such inservice tests confirm component OPERABILITY, and detect incipient failures by indicating abnormal performance. The Frequency of this SR is in accordance with the Inservice Testing Program.

SR 3.6.2.3.3

RHR Suppression Pool Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR suppression pool cooling subsystems and may also prevent water hammer and pump cavitation.

Selection of RHR Suppression Pool Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Suppression Pool Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible

BASES

SURVEILLANCE REQUIREMENTS (continued)

locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Suppression Pool Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Suppression Pool Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

REFERENCES

1. FSAR, Section 6.2.1.1.3.3.
 2. FSAR, Section 6.2.2.3.
 3. 10 CFR 50.36(c)(2)(ii).
 4. ASME Code for Operation and Maintenance of Nuclear Power Plants.
 5. NEDC-32988-A, Revision 2, Technical Justification to Support Risk-Informed Modification to Selected Required End States for BWR Plants, December 2002.
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B 3.9 REFUELING OPERATIONS

B 3.9.8 Residual Heat Removal (RHR) - High Water Level

BASES

BACKGROUND The purpose of the RHR System in MODE 5 is to remove decay heat and sensible heat from the reactor coolant, as required by GDC 34 (Ref. 1). Each of the two shutdown cooling loops of the RHR System can provide the required decay heat removal. Each loop consists of one motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after it has been cooled by circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Standby Service Water (SW) System. The RHR shutdown cooling mode is manually controlled.

In addition to the RHR subsystems, the volume of water above the reactor pressure vessel (RPV) flange provides a heat sink for decay heat removal.

APPLICABLE SAFETY ANALYSES With the unit in MODE 5, the RHR Shutdown Cooling System is not required to mitigate any events or accidents evaluated in the safety analyses. The RHR Shutdown Cooling System is required for removing decay heat to maintain the temperature of the reactor coolant.

The RHR System satisfies Criterion 4 of Reference 2

LCO Only one RHR shutdown cooling subsystem is required to be OPERABLE in MODE 5 with irradiated fuel in the RPV and the water level ≥ 22 ft above the RPV flange. Only one subsystem is required because the volume of water above the RPV flange provides backup decay heat removal capability.

An OPERABLE RHR shutdown cooling subsystem consists of an RHR pump, a heat exchanger, a SW pump providing cooling to the heat exchanger, valves, piping, instruments, and controls to ensure an OPERABLE flow path. [Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.](#)

Additionally, each RHR shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. Operation (either continuous or intermittent) of one subsystem can maintain and reduce the

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.8.1

This Surveillance demonstrates that the required RHR shutdown cooling subsystem is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.9.8.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the required RHR shutdown cooling subsystem(s) and may also prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

BASES

SURVEILLANCE REQUIREMENTS (continued)

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

- REFERENCES
1. 10 CFR 50, Appendix A, GDC 34.
 2. 10 CFR 50.36(c)(2)(ii).
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B 3.9 REFUELING OPERATIONS

B 3.9.9 Residual Heat Removal (RHR) - Low Water Level

BASES

BACKGROUND The purpose of the RHR System in MODE 5 is to remove decay heat and sensible heat from the reactor coolant, as required by GDC 34 (Ref. 1). Each of the two shutdown cooling loops of the RHR System can provide the required decay heat removal. Each loop consists of one motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after it has been cooled by circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Standby Service Water (SW) System. The RHR shutdown cooling mode is manually controlled.

APPLICABLE SAFETY ANALYSES With the unit in MODE 5, the RHR Shutdown Cooling System is not required to mitigate any events or accidents evaluated in the safety analyses. The RHR Shutdown Cooling System is required for removing decay heat to maintain the temperature of the reactor coolant.

The RHR System satisfies Criterion 4 of Reference 2.

LCO In MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and the water level < 22 ft above the reactor pressure vessel (RPV) flange both RHR shutdown cooling subsystems must be OPERABLE.

An OPERABLE RHR shutdown cooling subsystem consists of an RHR pump, a heat exchanger, a SW pump providing cooling to the heat exchanger, valves, piping, instruments, and controls to ensure an OPERABLE flow path. [Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.](#)

Additionally, each RHR shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. Operation (either continuous or intermittent) of one subsystem can maintain and reduce the reactor coolant temperature as required. However, to ensure adequate core flow to allow for accurate average reactor coolant temperature monitoring, nearly continuous operation is required. A Note is provided to allow a 2 hour exception to shut down the operating subsystem every 8 hours.

BASES

ACTIONS (continued)

(i.e., one secondary containment isolation valve and associated instrumentation are OPERABLE or other acceptable administrative controls to assure isolation capability. These administrative controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated). This may be performed as an administrative check, by examining logs or other information to determine whether the components are out of service for maintenance or other reasons. It is not necessary to perform the surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, the surveillance may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

C.1 and C.2

If no RHR shutdown cooling subsystem is in operation, an alternate method of coolant circulation is required to be established within 1 hour. The Completion Time is modified such that the 1 hour is applicable separately for each occurrence involving a loss of coolant circulation.

During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem), the reactor coolant temperature must be periodically monitored to ensure proper function of the alternate method. The once per hour Completion Time is deemed appropriate.

SURVEILLANCE REQUIREMENTS

SR 3.9.9.1

This Surveillance demonstrates that one RHR shutdown cooling subsystem is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.9.9.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR shutdown cooling subsystems and may also

BASES

SURVEILLANCE REQUIREMENTS (continued)

prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plan and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the susceptible location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same system flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. The Surveillance Frequency may vary by location susceptible to gas accumulation.

BASES

- REFERENCES
1. 10 CFR 50, Appendix A, GDC 34.
 2. 10 CFR 50.36(c)(2)(ii).
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