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June 29, 2017

Serial: BSEP 17-0060
LCP-0051 10 CFR 50.90

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

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

Ladies and Gentlemen:

Pursuant to 10 CFR 50.90, Duke Energy Progress, LLC (Duke Energy), is submitting a request for an amendment to the Technical Specifications (TS) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2.

The proposed change replaces existing TS requirements related to "operations with a potential for draining the reactor vessel" (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires reactor vessel water level to be greater than the top of active irradiated fuel.

Enclosure 1 provides a description and assessment of the proposed changes. Enclosures 2 and 3 provide the existing TS pages, for Units 1 and 2, marked to show the proposed changes. Enclosures 4 and 5 provide revised (i.e., typed) TS pages. Enclosure 6 provides existing Unit 1 TS Bases pages marked to show the proposed changes for information only.

Approval of the proposed amendment is requested by June 29, 2018. Once approved, the amendment shall be implemented within 180 days. In accordance with 10 CFR 50.91, Duke Energy is providing a copy of the proposed license amendment to the designated representative for the State of North Carolina.

This document contains no regulatory commitments.

Please refer any questions regarding this submittal to Mr. Lee Grzeck, Manager - Regulatory Affairs, at (910) 457-2487.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 29, 2017.

Sincerely,

William R. Gideon

MAT/mat

Enclosures:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-Up) - Unit 1
3. Proposed Technical Specification Changes (Mark-Up) - Unit 2
4. Revised Technical Specifications Pages - Unit 1
5. Revised Technical Specifications Pages - Unit 2
6. Proposed Technical Specification Bases Changes (Mark-Up) - Unit 1 (For Information Only)

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Description and Assessment

1.0 Description

The proposed change replaces existing Technical Specifications (TS) requirements related to "operations which have the potential for draining the reactor vessel" (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires reactor vessel water level to be greater than the top of active irradiated fuel.

2.0 Assessment

2.1 Applicability of Published Safety Evaluation

Duke Energy Progress, LLC (Duke Energy), has reviewed the safety evaluation provided to the Technical Specifications Task Force on December 20, 2016, as well as the information provided in TSTF-542. Duke Energy has concluded that the justifications presented in TSTF-542 and the safety evaluation prepared by the NRC staff are applicable to the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2, and justify this amendment for the incorporation of the changes to the BSEP TS.

The following BSEP TS either reference or are related to OPDRVs, and are affected by the proposed change:

1.1 Definitions
3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation
3.3.6.1 Primary Containment Isolation Instrumentation
3.3.6.2 Secondary Containment Isolation Instrumentation
3.3.7.1 Control Room Emergency Ventilation (CREV) System Instrumentation
3.5.2 ECCS - Shutdown
3.6.1.3 Primary Containment Isolation Valves (PCIVs)
3.6.4.1 Secondary Containment
3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)
3.6.4.3 Standby Gas Treatment (SGT) System
3.7.3 Control Room Emergency Ventilation (CREV) System
3.7.4 Control Room Air Conditioning (AC) System
3.8.2 AC Sources - Shutdown
3.8.5 DC Sources - Shutdown
3.8.8 Distribution Systems - Shutdown

2.2 Variations

Duke Energy is proposing the following variations from the TS changes described in TSTF-542 or the applicable parts of the NRC's safety evaluation. These variations do not affect the applicability of TSTF-542 or the NRC's safety evaluation to the proposed license amendment.

The BSEP TS use different numbering and titles than the Standard Technical Specifications (STS) on which TSTF-542 was based. Specifically, the following differences exist.

- BSEP TS 3.3.7.1, "Control Room Emergency Ventilation (CREV) System Instrumentation," corresponds to STS 3.3.7.1, "Main Control Room Environmental Control System Instrumentation,"
- BSEP TS 3.6.4.2, "Secondary Containment Isolation Dampers (SCIDs)," corresponds to STS 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs),"
- BSEP TS 3.7.3, "Control Room Emergency Ventilation (CREV) System," corresponds to STS 3.7.4, "Main Control Room Environmental Control System,"
- BSEP TS 3.7.4, "Control Room Air Conditioning (AC) System," corresponds to STS 3.7.5, "Control Room Air Conditioning (AC) System,"
- BSEP TSs do not include requirements corresponding to STS 3.8.8, "Inverters - Shutdown," and
- BSEP TS 3.8.8, "Distribution Systems - Shutdown," corresponds to STS 3.8.10, "Distribution Systems - Shutdown.

These differences are administrative and do not affect the applicability of TSTF-542 to the BSEP TS.

The BSEP TSs contain a Note in Surveillance Requirement (SR) 3.5.1.2 regarding realignment to the Low Pressure Coolant Injection mode which is similar to the Note in the STS LCO 3.5.2. Duke Energy requests relocation of the Note from the SR to the LCO section. This does not affect the applicability of TSTF-542 to the BSEP TS.

The Traveler and Safety Evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). As stated in the NRC's "Safety Evaluation of the Brunswick Steam Electric Station Units 1 and 2," dated November 1973, BSEP meets the intent of the GDC, published in the Federal Register on May 21, 1971, as Appendix A to 10 CFR Part 50. This difference does not alter the conclusion that the proposed change is applicable to BSEP.

The BSEP TSs contain a Surveillance Frequency Control Program. Therefore, the Surveillance Requirement Frequencies for Specification 3.5.2 are "In accordance with the Surveillance Frequency Control Program."

Duke Energy has chosen to implement the Reactor Pressure Vessel Water Inventory Control (WIC) Instrumentation specification as TS 3.3.5.3 and to not renumber the existing TS 3.3.5.2.

The BSEP TSs contain the following requirements that differ from the Standard Technical Specifications on which TSTF-542 was based, but are encompassed in the TSTF-542 justification.

1. The BSEP TS Table of Contents is licensee controlled. Revised pages are included for information.
2. STS Reactor Vessel Water Level - Low Low Low, Level 1 is referred to as Reactor Vessel Water Level - Low Level 3 in the BSEP TSs. STS Reactor Vessel Water Level - Low, Level 3 is referred to as Reactor Vessel Water Level - Low Level 1 in the BSEP TSs.

3. STS Table 3.3.5.1-1, Function 1.d, "Core Spray Pump Discharge Flow - Low," and Function 2.g, "Low Pressure Coolant Injection Pump- Discharge Flow - Low," are not included in the BSEP TSs. Also, STS Table 3.3.5.1-1, Function 1.e, and 2.h, "Manual Initiation," for the Core Spray (CS) System and Low Pressure Coolant Injection (LPCI) System are not included in the BSEP TSs. Therefore, they are not being included in TS 3.3.5.3, "Reactor Pressure Vessel (RPV) Water Inventory Control," Table 3.3.5.3-1. As a result of this design, BSEP TS 3.3.5.3 does not contain a Condition equivalent to STS 3.3.5.2, Condition D.

4. BSEP Table 3.3.5.1-1 includes Function 1.d, "Core Spray Pump Start - Time Delay Relay," which is not included in STS Table 3.3.5.1-1. The purpose of the time delay relays is to stagger the automatic start of the Core Spray pumps, limiting starting transients on their associated 4.16 kV emergency buses. This staggering is unnecessary for manual operation. Therefore, this function is not being included in Table 3.3.5.3-1 of TS 3.3.5.3. The applicability of Function 1.d is being modified to remove Mode 4 and 5. This is consistent with the intent of TSTF-542 and a similar change made to STS Function 2.f, "Low Pressure Coolant Injection Pump Start - Time Delay Relay."

5. STS Table 3.3.5.1-1, Function 1.e, and 2.h, "Manual Initiation," for the Core Spray System and LPCI System are not included in the BSEP TSs. Therefore, manual initiation functions for LPCI and CS are not being included in TS 3.3.5.3, Table 3.3.5.3-1. As a result of this design, proposed BSEP SR 3.5.2.8 is modified from the STS SR 3.5.2.8 to verification that the required ECCS injection/spray subsystem can be manually operated versus verifying that the subsystem actuates on a manual initiation signal. The manual operation of the LPCI and CS subsystems for the control of reactor cavity or RPV inventory are relatively simple evolutions and involve the manipulation of a small number of components. These subsystem alignments can be performed by licensed operators from the Main Control Room. This alternative is justified by the fact that a draining event is a slow evolution when compared to a design basis loss of coolant accident (LOCA), which is assumed to occur at full power, and thus there is adequate time to take manual actions (i.e., hours versus minutes). Adequate time to take action is assured since the proposed TS 3.5.2, Condition E, prohibits plant conditions that result in Drain Times that are less than one hour. Therefore, there is sufficient time for the licensed operators to take manual action to stop an unanticipated draining event, and to manually start an ECCS injection/spray subsystem or the additional method of water injection. Consequently, there is no need for manual initiation logic to actuate the required subsystem components. Since the LPCI and CS subsystems can be placed in service using manual means in a short period of time (i.e., within the timeframes assumed in the development of TSTF-542), using controls and indications that are readily available in the Main Control Room, manual operation of the required subsystem would be an equivalent alternative to system initiation via manual initiation logic.

   Additionally, since the manual initiation functions are not included in Table 3.3.5.3-1, the associated Logic System Functional Test would likewise not be required for TS 3.3.5.3; therefore, TS 3.3.5.3 as proposed for BSEP does not include a Logic System Functional Test SR.

6. TSTF-542 inadvertently omitted the corresponding TS Bases markup for the deletion of TS 3.3.6.1 Required Action J.2 regarding actions to isolate RHR shutdown cooling. BSEP TS Bases changes are made consistent with this TS change.

3.0 Regulatory Analysis

3.1 No Significant Hazards Consideration Analysis

Duke Energy Progress, LLC (Duke Energy), requests adoption of TSTF-542 "Reactor Pressure Vessel Water Inventory Control," which is an approved change to the Standard Technical Specifications (STS), into the Brunswick Steam Electric Plant (BSEP), Units 1 and 2, Technical Specifications (TS). The proposed amendment replaces the existing requirements in the TS related to "operations with a potential for draining the reactor vessel" (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Safety Limit 2.1.1.3 requires reactor vessel water level to be greater than the top of active irradiated fuel.

Duke Energy has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) 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 replaces existing TS requirements related to OPDRVs with new requirements on RPV WIC that will protect Safety Limit 2.1.1.3. Draining of RPV water inventory in Mode 4 (i.e., cold shutdown) and Mode 5 (i.e., refueling) is not an accident previously evaluated and, therefore, replacing the existing TS controls to prevent or mitigate such an event with a new set of controls has no effect on any accident previously evaluated. RPV water inventory control in Mode 4 or Mode 5 is not an initiator of any accident previously evaluated. The existing OPDRV controls or the proposed RPV WIC controls are not mitigating actions assumed in any accident previously evaluated.

   The proposed change reduces the probability of an unexpected draining event, which is not a previously evaluated accident, by imposing new requirements on the limiting time in which an unexpected draining event could result in the reactor vessel water level dropping to the top of the active fuel (TAF). These controls require cognizance of the plant configuration and control of configurations with unacceptably short drain times. These requirements reduce the probability of an unexpected draining event. The current TS requirements are only mitigating actions and impose no requirements that reduce the probability of an unexpected draining event.

   The proposed change reduces the consequences of an unexpected draining event, which is not a previously evaluated accident, by requiring an Emergency Core Cooling System (ECCS) subsystem to be operable at all times in Modes 4 and 5. The current TS requirements do not require any water injection systems, ECCS or otherwise, to be operable in certain conditions in Mode 5. The change in requirement from two ECCS subsystems to one ECCS subsystem in Modes 4 and 5 does not significantly affect the consequences of an unexpected draining event because the proposed Actions ensure equipment is available within the limiting drain time that is as capable of mitigating the event as the current requirements. The proposed controls provide escalating

compensatory measures to be established as calculated drain times decrease, such as verification of a second method of water injection and additional confirmations that containment and/or filtration would be available if needed.

The proposed change reduces or eliminates some requirements that were determined to be unnecessary to manage the consequences of an unexpected draining event, such as automatic initiation of an ECCS subsystem and control room ventilation. These changes do not affect the consequences of any accident previously evaluated since a draining event in Modes 4 and 5 is not a previously evaluated accident and the requirements are not needed to adequately respond to a draining event.

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 replaces existing TS requirements related to OPDRVs with new requirements on RPV WIC that will protect Safety Limit 2.1.1.3. The proposed change will not alter the design function of the equipment involved. Under the proposed change, some systems that are currently required to be operable during OPDRVs would be required to be available within the limiting drain time or to be in service depending on the limiting drain time. Should those systems be unable to be placed into service, the consequences are no different than if those systems were unable to perform their function under the current TS requirements.

   The event of concern under the current requirements and the proposed change is an unexpected draining event. The proposed change does not create new failure mechanisms, malfunctions, or accident initiators that would cause a draining event or a new or different kind of accident not previously evaluated or included in the design and licensing bases.

   Thus, based on the above, this change does not create the possibility of a new or different kind of accident from an accident previously evaluated.

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

   Response: No

   The proposed change replaces existing TS requirements related to OPDRVs with new requirements on RPV WIC. The current requirements do not have a stated safety basis and no margin of safety is established in the licensing basis. The safety basis for the new requirements is to protect Safety Limit 2.1.1.3. New requirements are added to determine the limiting time in which the RPV water inventory could drain to the top of the fuel in the reactor vessel, should an unexpected draining event occur. Plant configurations that could result in lowering the RPV water level to the TAF within one hour are now prohibited. New escalating compensatory measures based on the limiting drain time replace the current controls. The proposed TS establish a safety margin by

providing defense-in-depth to ensure that the Safety Limit is protected and to protect the public health and safety. While some less restrictive requirements are proposed for plant configurations with long calculated drain times, the overall effect of the change is to improve plant safety and to add safety margin.

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

Based on the above, Duke Energy 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 would alter a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would 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 significant increase in the amounts of any effluents 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.

Proposed Technical Specification Changes (Mark-Up) - Unit 1

TABLE OF CONTENTS

(continued)

, RPV WATER INVENTORY CONTROL,

TABLE OF CONTENTS

RPV Water Inventory Control

(continued)

1.1 Definitions

Insert 1

DOSE EQUIVALENT I-131 (continued)	Submersion, and Ingestion," 1989 and FGR 12, "External Exposure to Radionuclides in Air, Water, and Soil," 1993.
EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME	The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
ISOLATION INSTRUMENTATION RESPONSE TIME	The ISOLATION INSTRUMENTATION RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves receive the isolation signal (e.g., de-energization of the MSIV solenoids). The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
LEAKAGE	LEAKAGE shall be: a. <u>Identified LEAKAGE</u> 1. LEAKAGE into the drywell, such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or 2. LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;

(continued)

Insert 1

DRAIN TIME

The DRAIN TIME is the time it would take for the water inventory in and above the Reactor Pressure Vessel (RPV) to drain to the top of the active fuel (TAF) seated in the RPV assuming:

a) The water inventory above the TAF is divided by the limiting drain rate;

b) The limiting drain rate is the larger of the drain rate through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error), for all penetration flow paths below the TAF except:

   1. Penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths;

   2. Penetration flow paths capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation; or

   3. Penetration flow paths with isolation devices that can be closed prior to the RPV water level being equal to the TAF by a dedicated operator trained in the task, who in continuous communication with the control room, is stationed at the controls, and is capable of closing the penetration flow path isolation device without offsite power.

c) The penetration flow paths required to be evaluated per paragraph b) are assumed to open instantaneously and are not subsequently isolated, and no water is assumed to be subsequently added to the RPV water inventory;

d) No additional draining events occur; and

e) Realistic cross-sectional areas and drain rates are used.

A bounding DRAIN TIME may be used in lieu of a calculated value.

3.3 INSTRUMENTATION

3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

LCO 3.3.5.1 The ECCS instrumentation for each Function in Table 3.3.5.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.1-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.5.1-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	B.1 ---NOTES--- ~~1. Only applicable in MODES 1, 2, and 3.~~ ~~2.~~ Only applicable for Functions 1.a, 1.b, 2.a, and 2.b. --- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable. AND	1 hour from discovery of loss of initiation capability for feature(s) in both divisions (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 ----------NOTE---------- Only applicable for Functions 3.a and 3.b. ---------- Declare High Pressure Coolant Injection (HPCI) System inoperable.	1 hour from discovery of loss of HPCI initiation capability
	AND	
	B.3 Place channel in trip.	24 hours
C. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	C.1 ----------NOTES---------- ~~1. Only applicable in MODES 1, 2, and 3.~~ ~~2.~~ Only applicable for Functions 1.c, 1.d, 2.c, 2.d, and 2.f. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	AND	
	C.2 Restore channel to OPERABLE status.	24 hours

(continued)

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3, ~~4[(a)], 5[(a)]~~	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
	~~4[(a)], 5[(a)]~~	~~4~~	~~B~~	~~SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5~~	~~≥ 402 psig and ≤ 425 psig~~
d. Core Spray Pump Start—Time Delay Relay	1,2,3, ~~4[(a)], 5[(a)]~~	2 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 14 seconds and ≤ 16 seconds
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3, ~~4[(a)], 5[(a)]~~	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

~~(a) When associated subsystem(s) are required to be OPERABLE.~~

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
	~~4[(c)], 5[(c)]~~	~~4~~	~~B~~	~~SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5~~	~~≥ 402 psig and ≤ 425 psig~~
d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)	1[(b)],2[(b)], 3[(b)]	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 302 psig
e. Reactor Vessel Shroud Level	1,2,3	2	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -50 inches
f. RHR Pump Start—Time Delay Relay	1,2,3, ~~4[(c)], 5[(c)]~~	4 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 9 seconds and ≤ 11 seconds
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level—Low Level 2	1, 2[(c)], 3[(c)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 101 inches
b. Drywell Pressure—High	1, 2[(c)],3[(c)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

Replace (b) with (a)

Replace (c) with (b)

(a)

~~(a)~~ ~~When associated subsystem(s) are required to be OPERABLE.~~

~~(b)~~ With associated recirculation pump discharge valve or recirculation pump discharge bypass valve open.

~~(c)~~ With reactor steam dome pressure > 150 psig.

(b)

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCI System (continued)					
c. Reactor Vessel Water Level—High	1, 2(c), 3(c)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 207 inches
d. Condensate Storage Tank Level—Low	1, 2(c), 3(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 23 feet 4 inches
e. Suppression Chamber Water Level—High	1, 2(c), 3(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤-2 feet
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level—Low Level 3	1, 2(c), 3(c)	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2(c), 3(c)	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2(c), 3(c)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2(c), 3(c)	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2(c), 3(c)	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

Replace (c) with (b) for each function on this page

(continued)

(c) With reactor steam dome pressure > 150 psig.

(b)

Table 3.3.5.1-1 (page 4 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. ADS Trip System B					
a. Reactor Vessel Water Level—Low Level 3	1, 2 ~~(c)~~, 3 ~~(c)~~	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2 ~~(c)~~, 3 ~~(c)~~	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2 ~~(c)~~, 3 ~~(c)~~	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2 ~~(c)~~, 3 ~~(c)~~	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2 ~~(c)~~, 3 ~~(c)~~	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

Replace (c) with (b) for each function on this page

~~(c)~~ With reactor steam dome pressure > 150 psig.

(b)

Insert 2
New TS 3.3.5.3

3.3 INSTRUMENTATION

3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

LCO 3.3.5.3 The RPV Water Inventory Control instrumentation for each Function in Table 3.3.5.3-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.3-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more channels inoperable.	A.1	Enter the Condition referenced in Table 3.3.5.3-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	B.1	Declare associated penetration flow path(s) incapable of automatic isolation.	Immediately
	AND		
	B.2	Calculate DRAIN TIME.	Immediately
C. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	C.1	Place channel in trip.	1 hour

(continued)

Insert 2
New TS 3.3.5.3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C or D not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTES---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Insert 2
New TS 3.3.5.3

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
I. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	I.1	Declare associated standby liquid control subsystem (SLC) inoperable.	1 hour
	OR		
	I.2	Isolate the Reactor Water Cleanup (RWCU) System.	1 hour
J. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	J.1	Initiate action to restore channel to OPERABLE status.	Immediately
	~~OR~~		
	~~J.2~~	~~Initiate action to isolate the Residual Heat Removal (RHR) Shutdown Cooling (SDC) System.~~	~~Immediately~~

Table 3.3.6.1-1 (page 5 of 5)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
6. RHR Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure—High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 137 psig
b. Reactor Vessel Water Level— Low Level 1	~~3,4,5~~	2~~(d)~~	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
7. Traversing In-core Probe Isolation					
a. Reactor Vessel Water Level – Low Level 1	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≤ 1.8 psig

~~(d) In MODES 4 and 5, provided RHR Shutdown Cooling System integrity maintained, only one channel per trip system with an isolation signal available to one RHR shutdown cooling pump suction isolation valve is required.~~

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level—Low Level 2	1,2,3~~,~~	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≥ 101 inches
2. Drywell Pressure—High	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 1.8 psig
3. Reactor Building Exhaust Radiation—High	1,2,3~~,~~ (a)~~,(b)~~	1	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 16 mR/hr

~~(a) During operations with a potential for draining the reactor vessel.~~

~~(b)~~ During movement of recently irradiated fuel assemblies in secondary containment.

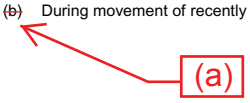


Table 3.3.7.1-1 (page 1 of 1)
Control Room Emergency Ventilation (CREV) System Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Control Building Air Intake Radiation - High	1, 2, 3 (a), ~~(b)~~	2	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	≤ 27 mR/hr
2. Unit 1 Secondary Containment Isolation - CREV Auto-Start	1, 2, 3	2	SR 3.3.6.2.2 SR 3.3.6.2.5	~~(c)~~

(a) During movement of recently irradiated fuel assemblies in secondary containment.

~~(b) During operations with a potential for draining the reactor vessel.~~

~~(c)~~ The auto-start signal is provided from Secondary Containment Isolation logic and does not depend on a specific instrument; for Secondary Containment Isolation Instrumentation, refer to Table 3.3.6.2-1.

(b)

(b)

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

3.5.1 ECCS—Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable. OR One low pressure coolant injection (LPCI) pump in each subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. One LPCI pump inoperable. AND One core spray (CS) subsystem inoperable.	B.1 Restore LPCI pump to OPERABLE status. OR B.2 Restore CS subsystem to OPERABLE status.	72 hours 72 hours

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 Reactor Pressure Vessel (RPV) Water Inventory ControlECCS—Shutdown

LCO 3.5.2 DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be ≥ 36 hours.

AND

OneTwo low pressure ECCS injection/spray subsystems shall be OPERABLE.

----------NOTE----------
A 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.

APPLICABILITY: MODES 4 and 5,

MODE 5, except with the spent fuel storage pool gates removed and water level ≥ 21 feet 10 inches over the top of the reactor pressure vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One rRequired ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to establish a method of water injection capable of operating without offsite electrical power.Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
C. DRAIN TIME < 36 hours and ≥ 8 hours.Two required ECCS injection/spray	C.1 Verify secondary containment boundary is capable of being	4 hoursImmediately

subsystems inoperable.		established in less than the DRAIN TIME.Initiate action to suspend OPDRVs.	
	AND		
	C.2	Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME.Restore one ECCS injection/spray subsystem to OPERABLE status.	4 hours
	AND		
	C.3	Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours
D. DRAIN TIME < 8 hours.Required Action C.2 and associated Completion Time not met.	D.1	----------NOTE---------- Required ECCS injection/spray subsystem or additional method of water injection shall be capable of operating without offsite electrical power. ----------	
		Initiate action to establish an additional method of water injection with water sources capable of maintaining RPV water level > TAF for ≥ 36 hours.Initiate action to restore secondary containment to OPERABLE status.	Immediately
	AND		
	D.2	Initiate action to establish secondary containment boundary.	Immediately

	AND		
	D.3	Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
	AND		
	D.42	Initiate action to verify restore one standby gas treatment subsystem is capable of being placed in operation.to OPERABLE status.	Immediately
	AND		
	D.3	Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore Drain Time to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.21	Verify, for a each required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.32	Verify, for a each required core spray (CS) subsystem, the: a. Suppression pool water level is ≥ -31 inches; or b. ----------NOTE---------- Only one required CS subsystem may take credit for this option during OPDRVs. ---------- Condensate storage tank water volume is ≥ 228,200 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.43	Verify, for the 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 3.5.2.54	----------NOTES---------- 1. One 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 control. ---------- Verify for the each required ECCS injection/spray subsystem each 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.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE				FREQUENCY
SR 3.5.2.6~~5~~	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes. ~~Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.~~			In accordance with the Surveillance Frequency Control Program
	~~SYSTEM~~	~~FLOW RATE~~	~~NO. OF PUMPS~~	~~SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF~~
	~~CS~~	~~≥ 4100 gpm~~	~~1~~	~~≥ 113 psig~~
	~~LPCI~~	~~≥ 9000 gpm~~	~~1~~	~~≥ 20 psig~~
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.			In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8~~6~~	----------NOTE---------- Vessel injection/spray may be excluded. ----------			
	Verify the ~~each~~ required ECCS injection/spray subsystem can be manually operated ~~actuates on an actual or simulated automatic initiation signal~~.			In accordance with the Surveillance Frequency Control Program
~~SR 3.5.2.7~~	~~----------NOTE---------- Instrumentation response time may be assumed to be the design instrumentation response time. ----------~~			
	~~Verify the ECCS RESPONSE TIME for each required ECCS injection/spray subsystem is within the limit.~~			~~In accordance with the Surveillance Frequency Control Program~~

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

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

----------NOTE----------
LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RCIC System inoperable.	A.1	Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately
	AND		
	A.2	Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more penetration flow paths with one or more MSIVs not within MSIV leakage rate limits.	D.1 Restore leakage rate to within limit.	8 hours
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1 Be in MODE 3. AND E.2 Be in MODE 4.	12 hours 36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	~~F.1~~ ~~Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).~~ ~~OR~~ ~~F.2~~ Initiate action to restore valve(s) to OPERABLE status.	~~Immediately~~ Immediately

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment,

~~During operations with a potential for draining the reactor vessel (OPDRVs).~~

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1 Restore secondary containment to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment~~, or during OPDRVs~~.	C.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment. ~~AND~~	Immediately (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~C. (continued)~~	~~C.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.2	Verify one secondary containment access door is closed in each access opening.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.3	Verify each SGT subsystem can maintain $\geq$ 0.25 inch of vacuum water gauge in the secondary containment for 1 hour at a flow rate $\leq$ 3000 cfm.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)

LCO 3.6.4.2 Each SCID shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment,

~~During operations with a potential for draining the reactor vessel (OPDRVs).~~

ACTIONS

---NOTES---

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIDs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one SCID inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange. AND	8 hours (continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	D.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	~~AND~~	
	~~D.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.2.1	Verify the isolation time of each automatic SCID is within limits.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.2.2	Verify each automatic SCID actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment,

~~During operations with a potential for draining the reactor vessel (OPDRVs).~~

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable in MODE 1, 2 or 3.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met. OR Two SGT subsystems inoperable in MODE 1, 2, or 3.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One SGT subsystem inoperable during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	C.1 Restore SGT subsystem to OPERABLE status.	31 days
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE SGT subsystem in operation.	Immediately
	OR	
	D.2~~.1~~ Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately
	~~AND~~	
	~~D.2.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	E.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately
	~~AND~~	
	~~E.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

----------NOTE----------
The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
~~During operations with a potential for draining the reactor vessel (OPDRVs).~~

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREV subsystem inoperable for reasons other than Condition B.	A.1	Restore CREV subsystem to OPERABLE status.	7 days
B. One or more CREV subsystems inoperable due to inoperable CRE Boundary in Mode 1, 2, or 3.	B.1	Initiate action to implement mitigating actions.	Immediately
	AND		
	B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	AND		
	B.3	Restore CRE boundary to Operable status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. OR Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE CREV subsystem in radiation/smoke protection mode. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~D.2.3 Initiate action to suspend OPDRVs.~~	 Immediately Immediately Immediately ~~Immediately~~

or

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, ~~or during OPDRVs~~. OR One or more CREV subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, ~~or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- E.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND E.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~E.3 Initiate action to suspend OPDRVs.~~	 Immediately Immediately ~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CREV subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2	Perform required CREV filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,

During CORE ALTERATIONS~~,~~

~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1	Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1	Restore one inoperable control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1	Be in MODE 3.	12 hours
	AND		
	C.2	Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE control room AC subsystem(s) in operation. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~D.2.3 Initiate action to suspend OPDRVs.~~	 Immediately Immediately Immediately ~~Immediately~~
E. Three control room AC subsystems inoperable in MODE 1, 2, or 3.	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Three control room AC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~F.3 Initiate actions to suspend OPDRVs.~~	 Immediately Immediately ~~Immediately~~

or

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify each control room AC subsystem has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ACTIONS

---NOTE---
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more required offsite circuits inoperable.	----------NOTE---------- Enter applicable Condition and Required Actions of LCO 3.8.8, with one or more required 4.16 kV emergency buses de-energized as a result of Condition A. ----------		
	A.1	Declare affected required feature(s), with no offsite power available, inoperable.	Immediately
	OR		
	A.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	A.2.2	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND		
	~~A.2.3~~	~~Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).~~	~~Immediately~~
	~~AND~~		

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.~~4~~ Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. One required DG inoperable.	B.1 Declare affected required feature(s) with no DG available inoperable.	Immediately
	OR	
	B.2.1 Suspend CORE ALTERATIONS.	Immediately
	AND	
	B.2.2 Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND	
	~~B.2.3~~ ~~Initiate action to suspend OPDRVs.~~	~~Immediately~~
	AND	
	B.2.~~4~~ Initiate action to restore required DG to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Two required DGs inoperable.	C.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	C.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	~~C.3~~	~~Initiate action to suspend OPDRVs.~~	~~Immediately~~
	~~AND~~		
	C.~~4~~	Initiate action to restore required DGs to OPERABLE status.	Immediately

3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	----------NOTE---------- Unless required to be performed by Unit 2 Specification 3.8.1, the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13, and SR 3.8.1.14. ----------	
	For AC sources required to be OPERABLE the SRs of Specification 3.8.1, except SR 3.8.1.8 and SR 3.8.1.12, are applicable.	In accordance with applicable SRs

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	Immediately
	~~A.2.3 Initiate action to suspend operations with a potential for draining the reactor vessel.~~ ~~AND~~	~~Immediately~~
	A.2.~~4~~ Initiate action to restore required DC electrical power subsystems to OPERABLE status.	Immediately

3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	~~A.2.3~~ ~~Initiate action to suspend operations with a potential for draining the reactor vessel.~~	~~Immediately~~
	~~AND~~	
	A.2.~~4~~ Initiate actions to restore required AC and DC electrical power distribution subsystems to OPERABLE status.	Immediately
	AND	
	A.2.~~5~~ Declare associated required shutdown cooling subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	Verify correct breaker alignments and indicated power availability to required AC and DC electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

Proposed Technical Specification Changes (Mark-Up) - Unit 2

TABLE OF CONTENTS

(continued)

, RPV WATER INVENTORY CONTROL,

TABLE OF CONTENTS

RPV Water Inventory Control

(continued)

1.1 Definitions

Insert 1

DOSE EQUIVALENT I-131 (continued)	Submersion, and Ingestion," 1989 and FGR 12, "External Exposure to Radionuclides in Air, Water, and Soil," 1993.
EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME	The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
ISOLATION INSTRUMENTATION RESPONSE TIME	The ISOLATION INSTRUMENTATION RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves receive the isolation signal (e.g., de-energization of the MSIV solenoids). The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
LEAKAGE	LEAKAGE shall be: a. <u>Identified LEAKAGE</u> 1. LEAKAGE into the drywell, such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or 2. LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;

(continued)

Insert 1

DRAIN TIME

The DRAIN TIME is the time it would take for the water inventory in and above the Reactor Pressure Vessel (RPV) to drain to the top of the active fuel (TAF) seated in the RPV assuming:

a) The water inventory above the TAF is divided by the limiting drain rate;

b) The limiting drain rate is the larger of the drain rate through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error), for all penetration flow paths below the TAF except:

   1. Penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths;

   2. Penetration flow paths capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation; or

   3. Penetration flow paths with isolation devices that can be closed prior to the RPV water level being equal to the TAF by a dedicated operator trained in the task, who in continuous communication with the control room, is stationed at the controls, and is capable of closing the penetration flow path isolation device without offsite power.

c) The penetration flow paths required to be evaluated per paragraph b) are assumed to open instantaneously and are not subsequently isolated, and no water is assumed to be subsequently added to the RPV water inventory;

d) No additional draining events occur; and

e) Realistic cross-sectional areas and drain rates are used.

A bounding DRAIN TIME may be used in lieu of a calculated value.

3.3 INSTRUMENTATION

3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

LCO 3.3.5.1 The ECCS instrumentation for each Function in Table 3.3.5.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.1-1.

ACTIONS

---NOTE---

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.5.1-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	B.1 ----------NOTES---------- ~~1. Only applicable in MODES 1, 2, and 3.~~ ~~2.~~ Only applicable for Functions 1.a, 1.b, 2.a, and 2.b. --- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable. AND	1 hour from discovery of loss of initiation capability for feature(s) in both divisions (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. (continued)	B.2 ----------NOTE---------- Only applicable for Functions 3.a and 3.b. ---------- Declare High Pressure Coolant Injection (HPCI) System inoperable.	1 hour from discovery of loss of HPCI initiation capability
	AND	
	B.3 Place channel in trip.	24 hours
C. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	C.1 ----------NOTES---------- ~~1. Only applicable in MODES 1, 2, and 3.~~ ~~2.~~ Only applicable for Functions 1.c, 1.d, 2.c, 2.d, and 2.f. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	AND	
	C.2 Restore channel to OPERABLE status.	24 hours

(continued)

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3, ~~4[(a)], 5[(a)]~~	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
	~~4[(a)], 5[(a)]~~	~~4~~	~~B~~	~~SR 3.3.5.1.1~~ ~~SR 3.3.5.1.2~~ ~~SR 3.3.5.1.3~~ ~~SR 3.3.5.1.4~~ ~~SR 3.3.5.1.5~~	~~≥ 402 psig~~ ~~and~~ ~~≤ 425 psig~~
d. Core Spray Pump Start—Time Delay Relay	1,2,3, ~~4[(a)], 5[(a)]~~	2 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 14 seconds and ≤ 16 seconds
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3, ~~4[(a)], 5[(a)]~~	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

~~(a) When associated subsystem(s) are required to be OPERABLE.~~

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
	~~4[(a)], 5[(a)]~~	~~4~~	~~B~~	~~SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5~~	~~≥ 402 psig and ≤ 425 psig~~
d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)	1[(b)],2[(b)], 3[(b)]	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 302 psig
e. Reactor Vessel Shroud Level	1,2,3	2	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -50 inches
f. RHR Pump Start—Time Delay Relay	1,2,3, 4[(a)], 5[(a)]	4 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 9 seconds and ≤ 11 seconds
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level—Low Level 2	1, 2[(c)], 3[(c)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 101 inches
b. Drywell Pressure—High	1, 2[(c)],3[(c)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

Replace [(b)] with [(a)]

Replace [(c)] with [(b)]

[(a)]

~~(a) When associated subsystem(s) are required to be OPERABLE.~~

~~(b)~~ With associated recirculation pump discharge valve or recirculation pump discharge bypass valve open.

~~(c)~~ With reactor steam dome pressure > 150 psig.

[(b)]

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCI System (continued)					
c. Reactor Vessel Water Level—High	1, 2(c), 3(c)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 207 inches
d. Condensate Storage Tank Level—Low	1, 2(c), 3(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 23 feet 4 inches
e. Suppression Chamber Water Level—High	1, 2(c), 3(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤-2 feet
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level—Low Level 3	1, 2(c), 3(c)	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2(c), 3(c)	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2(c), 3(c)	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2(c), 3(c)	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2(c), 3(c)	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

(continued)

Replace (c) with (b) for each function on this page

~~(c)~~ With reactor steam dome pressure > 150 psig.

(b)

Table 3.3.5.1-1 (page 4 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. ADS Trip System B					
a. Reactor Vessel Water Level—Low Level 3	1, 2[c], 3[c]	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2[c], 3[c]	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2[c], 3[c]	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2[c], 3[c]	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2[c], 3[c]	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

Replace [c] with [b] for each function on this page

[c] With reactor steam dome pressure > 150 psig.

(b)

Insert 2
New TS 3.3.5.3

3.3 INSTRUMENTATION

3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

LCO 3.3.5.3 The RPV Water Inventory Control instrumentation for each Function in Table 3.3.5.3-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.3-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more channels inoperable.	A.1	Enter the Condition referenced in Table 3.3.5.3-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	B.1	Declare associated penetration flow path(s) incapable of automatic isolation.	Immediately
	AND		
	B.2	Calculate DRAIN TIME.	Immediately
C. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	C.1	Place channel in trip.	1 hour

(continued)

Insert 2
New TS 3.3.5.3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C or D not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTES---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Insert 2
New TS 3.3.5.3

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
I. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	I.1	Declare associated standby liquid control subsystem (SLC) inoperable.	1 hour
	OR		
	I.2	Isolate the Reactor Water Cleanup (RWCU) System.	1 hour
J. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	J.1	Initiate action to restore channel to OPERABLE status.	Immediately
	~~OR~~		
	~~J.2~~	~~Initiate action to isolate the Residual Heat Removal (RHR) Shutdown Cooling (SDC) System~~.	~~Immediately~~

Table 3.3.6.1-1 (page 5 of 5)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
6. RHR Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure—High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 137 psig
b. Reactor Vessel Water Level— Low Level 1	~~3,4,5~~	2~~(d)~~	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
7. Traversing In-core Probe Isolation					
a. Reactor Vessel Water Level - Low Level 1	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≤ 1.8 psig

~~(d) In MODES 4 and 5, provided RHR Shutdown Cooling System integrity maintained, only one channel per trip system with an isolation signal available to one RHR shutdown cooling pump suction isolation valve is required.~~

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Reactor Vessel Water Level—Low Level 2	1,2,3~~,~~	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≥ 101 inches
2.	Drywell Pressure—High	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 1.8 psig
3.	Reactor Building Exhaust Radiation—High	1,2,3~~,~~ (a)~~,(b)~~	1	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 16 mR/hr

~~(a)~~ ~~During operations with a potential for draining the reactor vessel.~~

~~(b)~~ During movement of recently irradiated fuel assemblies in secondary containment.

Table 3.3.7.1-1 (page 1 of 1)
Control Room Emergency Ventilation (CREV) System Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Control Building Air Intake Radiation - High	1, 2, 3 (a), ~~(b)~~	2	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	≤ 27 mR/hr
2. Unit 2 Secondary Containment Isolation - CREV Auto-Start	1, 2, 3	2	SR 3.3.6.2.2 SR 3.3.6.2.5	~~(c)~~

(a) During movement of recently irradiated fuel assemblies in secondary containment.

~~(b) During operations with a potential for draining the reactor vessel.~~

~~(c)~~ The auto-start signal is provided from Secondary Containment Isolation logic and does not depend on a specific instrument; for Secondary Containment Isolation Instrumentation, refer to Table 3.3.6.2-1.

(b)

(b)

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

3.5.1 ECCS—Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable. OR One low pressure coolant injection (LPCI) pump in each subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. One LPCI pump inoperable. AND One core spray (CS) subsystem inoperable.	B.1 Restore LPCI pump to OPERABLE status. OR B.2 Restore CS subsystem to OPERABLE status.	72 hours 72 hours

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 Reactor Pressure Vessel (RPV) Water Inventory ControlECCS—Shutdown

LCO 3.5.2 DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be ≥ 36 hours.

AND

OneTwo low pressure ECCS injection/spray subsystems shall be OPERABLE.

----------NOTE----------
A 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.

APPLICABILITY: MODES 4 and 5,

MODE 5, except with the spent fuel storage pool gates removed and water level ≥ 21 feet 10 inches over the top of the reactor pressure vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One rRequired ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to establish a method of water injection capable of operating without offsite electrical power.Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
C. DRAIN TIME < 36 hours and ≥ 8 hours.Two required ECCS injection/spray	C.1 Verify secondary containment boundary is capable of being	4 hoursImmediately

subsystems inoperable.		established in less than the DRAIN TIME.Initiate action to suspend OPDRVs.	
	AND		
	C.2	Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME.Restore one ECCS injection/spray subsystem to OPERABLE status.	4 hours
	AND		
	C.3	Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours
D. DRAIN TIME < 8 hours.Required Action C.2 and associated Completion Time not met.	D.1	----------NOTE---------- Required ECCS injection/spray subsystem or additional method of water injection shall be capable of operating without offsite electrical power. ----------	
		Initiate action to establish an additional method of water injection with water sources capable of maintaining RPV water level > TAF for ≥ 36 hours.Initiate action to restore secondary containment to OPERABLE status.	Immediately
	AND		
	D.2	Initiate action to establish secondary containment boundary.	Immediately

		AND	
		D.3 Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
		AND	
		D.42 Initiate action to verify restore one standby gas treatment subsystem is capable of being placed in operation.to OPERABLE status.	Immediately
		AND	
		D.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore Drain Time to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.21	Verify, for a each required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.32	Verify, for a each required core spray (CS) subsystem, the: a. Suppression pool water level is ≥ -31 inches; or b. ----------NOTE---------- Only one required CS subsystem may take credit for this option during OPDRVs. ---------- Condensate storage tank water volume is ≥ 228,200 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.43	Verify, for the 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 3.5.2.54	----------NOTES---------- 1. One 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 control. ---------- Verify for the each required ECCS injection/spray subsystem each 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.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.65	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.Verify each required ECCS pump develops the specified flow rate against a system head corresponding to the specified reactor pressure.	In accordance with the Surveillance Frequency Control Program
	SYSTEM / FLOW RATE / NO. OF PUMPS / SYSTEM HEAD CORRESPONDING TO A REACTOR PRESSURE OF CS / ≥ 4100 gpm / 1 / ≥ 113 psig LPCI / ≥ 9000 gpm / 1 / ≥ 20 psig	
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.86	----------NOTE---------- Vessel injection/spray may be excluded. ----------	
	Verify the each required ECCS injection/spray subsystem can be manually operatedactuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.7	----------NOTE---------- Instrumentation response time may be assumed to be the design instrumentation response time. ----------	
	Verify the ECCS RESPONSE TIME for each required ECCS injection/spray subsystem is within the limit.	In accordance with the Surveillance Frequency Control Program

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

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3 with reactor steam dome pressure > 150 psig.

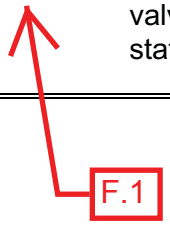
ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RCIC System inoperable.	A.1	Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately
	AND		
	A.2	Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more penetration flow paths with one or more MSIVs not within MSIV leakage rate limits.	D.1 Restore leakage rate to within limit.	8 hours
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1 Be in MODE 3. AND E.2 Be in MODE 4.	12 hours 36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	~~F.1~~ ~~Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).~~ ~~OR~~ ~~F.2~~ Initiate action to restore valve(s) to OPERABLE status.	~~Immediately~~ Immediately



3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment~~,~~

~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1 Restore secondary containment to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment~~, or during OPDRVs~~.	C.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment. ~~AND~~	 Immediately (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
~~C. (continued)~~	~~C.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.2	Verify one secondary containment access door is closed in each access opening.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.3	Verify each SGT subsystem can maintain $\geq$ 0.25 inch of vacuum water gauge in the secondary containment for 1 hour at a flow rate $\leq$ 3000 cfm.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)

LCO 3.6.4.2 Each SCID shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment~~,~~

~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

---NOTES---

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIDs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one SCID inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange. AND	8 hours (continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	D.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	~~AND~~	
	~~D.2~~ ~~Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.2.1	Verify the isolation time of each automatic SCID is within limits.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.2.2	Verify each automatic SCID actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment~~,~~

~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable in MODE 1, 2 or 3.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met. OR Two SGT subsystems inoperable in MODE 1, 2, or 3.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One SGT subsystem inoperable during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	C.1 Restore SGT subsystem to OPERABLE status.	31 days
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE SGT subsystem in operation.	Immediately
	OR	
	D.2~~.1~~ Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately
	~~AND~~	
	~~D.2.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment ~~or during OPDRVs~~.	E.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately
	~~AND~~	
	~~E.2 Initiate action to suspend OPDRVs.~~	~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

----------NOTE----------
The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS~~,~~
~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREV subsystem inoperable for reasons other than Condition B.	A.1	Restore CREV subsystem to OPERABLE status.	7 days
B. One or more CREV subsystems inoperable due to inoperable CRE Boundary in Mode 1, 2, or 3.	B.1	Initiate action to implement mitigating actions.	Immediately
	AND		
	B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	AND		
	B.3	Restore CRE boundary to Operable status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. OR Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE CREV subsystem in radiation/smoke protection mode. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~D.2.3 Initiate action to suspend OPDRVs.~~	 Immediately Immediately Immediately ~~Immediately~~

or

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~. OR One or more CREV subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- E.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND E.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~E.3 Initiate action to suspend OPDRVs.~~	 Immediately Immediately ~~Immediately~~

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CREV subsystem for ≥ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2	Perform required CREV filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,

During CORE ALTERATIONS~~,~~

~~During operations with a potential for draining the reactor vessel (OPDRVs)~~.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1	Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1	Restore one inoperable control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1	Be in MODE 3.	12 hours
	AND		
	C.2	Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE control room AC subsystem(s) in operation. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~D.2.3 Initiate action to suspend OPDRVs.~~	Immediately Immediately Immediately ~~Immediately~~
E. Three control room AC subsystems inoperable in MODE 1, 2, or 3.	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Three control room AC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment~~,~~ during CORE ALTERATIONS~~, or during OPDRVs~~.	----------NOTE---------- LCO 3.0.3 is not applicable ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS. ~~AND~~ ~~F.3 Initiate actions to suspend OPDRVs.~~	 Immediately Immediately ~~Immediately~~

or

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify each control room AC subsystem has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ACTIONS

----------NOTE----------
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more required offsite circuits inoperable.	----------NOTE---------- Enter applicable Condition and Required Actions of LCO 3.8.8, with one or more required 4.16 kV emergency buses de-energized as a result of Condition A. ----------		
	A.1	Declare affected required feature(s), with no offsite power available, inoperable.	Immediately
	OR		
	A.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	A.2.2	Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND		
	~~A.2.3~~	~~Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).~~	~~Immediately~~
	AND		

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.~~4~~ Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. One required DG inoperable.	B.1 Declare affected required feature(s) with no DG available inoperable.	Immediately
	OR	
	B.2.1 Suspend CORE ALTERATIONS.	Immediately
	AND	
	B.2.2 Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND	
	~~B.2.3 Initiate action to suspend OPDRVs.~~	~~Immediately~~
	AND	
	B.2.~~4~~ Initiate action to restore required DG to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Two required DGs inoperable.	C.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	C.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	~~C.3~~	~~Initiate action to suspend OPDRVs.~~	~~Immediately~~
	AND		
	C.~~4~~	Initiate action to restore required DGs to OPERABLE status.	Immediately

3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	----------NOTE---------- Unless required to be performed by Unit 1 Specification 3.8.1, the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13, and SR 3.8.1.14. ----------	
	For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, except SR 3.8.1.8 and SR 3.8.1.12, are applicable.	In accordance with applicable SRs

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	Immediately
	~~A.2.3 Initiate action to suspend operations with a potential for draining the reactor vessel.~~ ~~AND~~	~~Immediately~~
	A.2.~~4~~ Initiate action to restore required DC electrical power subsystems to OPERABLE status.	Immediately

3

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	~~A.2.3~~	~~Initiate action to suspend operations with a potential for draining the reactor vessel.~~	~~Immediately~~
	~~AND~~		
	A.2.~~4~~	Initiate actions to restore required AC and DC electrical power distribution subsystems to OPERABLE status.	Immediately
	AND		
	A.2.~~5~~	Declare associated required shutdown cooling subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	Verify correct breaker alignments and indicated power availability to required AC and DC electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

Revised Technical Specifications Pages - Unit 1

1.1 Definitions

DOSE EQUIVALENT I-131 (continued)	Submersion, and Ingestion," 1989 and FGR 12, "External Exposure to Radionuclides in Air, Water, and Soil," 1993.
DRAIN TIME	The DRAIN TIME is the time it would take for the water inventory in and above the Reactor Pressure Vessel (RPV) to drain to the top of the active fuel (TAF) seated in the RPV assuming: a) The water inventory above the TAF is divided by the limiting drain rate; b) The limiting drain rate is the larger of the drain rate through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error), for all penetration flow paths below the TAF except: 1. Penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths; 2. Penetration flow paths capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation; or 3. Penetration flow paths with isolation devices that can be closed prior to the RPV water level being equal to the TAF by a dedicated operator trained in the task, who in continuous communication with the control room, is stationed at the controls, and is capable of closing the penetration flow path isolation device without offsite power. c) The penetration flow paths required to be evaluated per paragraph b) are assumed to open instantaneously and are not subsequently isolated, and no water is assumed to be subsequently added to the RPV water inventory;

(continued)

1.1 Definitions

DRAIN TIME (continued)	d) No additional draining events occur; and e) Realistic cross-sectional areas and drain rates are used. A bounding DRAIN TIME may be used in lieu of a calculated value.
EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME	The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
ISOLATION INSTRUMENTATION RESPONSE TIME	The ISOLATION INSTRUMENTATION RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves receive the isolation signal (e.g., de-energization of the MSIV solenoids). The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
LEAKAGE	LEAKAGE shall be: a. <u>Identified LEAKAGE</u> 1. LEAKAGE into the drywell, such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or 2. LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;

(continued)

1.1 Definitions

LEAKAGE (continued)	b. <u>Unidentified LEAKAGE</u> All LEAKAGE into the drywell that is not identified LEAKAGE; c. Total LEAKAGE Sum of the identified and unidentified LEAKAGE; and d. Pressure Boundary LEAKAGE LEAKAGE through a nonisolable fault in a Reactor Coolant System (RCS) component body, pipe wall, or vessel wall.
LINEAR HEAT GENERATION RATE (LHGR)	The LHGR shall be the heat generation rate per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.
LOGIC SYSTEM FUNCTIONAL TEST	A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all required logic components (i.e., all required relays and contacts, trip units, solid state logic elements, etc.) of a logic circuit, from as close to the sensor as practicable up to, but not including, the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total system steps so that the entire logic system is tested.
MINIMUM CRITICAL POWER RATIO (MCPR)	The MCPR shall be the smallest critical power ratio (CPR) that exists in the core. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power.
MODE	A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

(continued)

1.1 Definitions (continued)

OPERABLE—OPERABILITY	A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2923 MWt.
REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME	The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
SHUTDOWN MARGIN (SDM)	SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that: a. The reactor is xenon free; b. The moderator temperature is 68°F; and c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

(continued)

1.1 Definitions (continued)

STAGGERED TEST BASIS	A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during *n* Surveillance Frequency intervals, where *n* is the total number of systems, subsystems, channels, or other designated components in the associated function.
THERMAL POWER	THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.
TURBINE BYPASS SYSTEM RESPONSE TIME	The TURBINE BYPASS SYSTEM RESPONSE TIME consists of two components: a. The time from initial movement of the main turbine stop valve or control valve until 80% of the turbine bypass capacity is established; and b. The time from initial movement of the main turbine stop valve or control valve until initial movement of the turbine bypass valve. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

Table 1.1-1 (page 1 of 1)
MODES

MODE	TITLE	REACTOR MODE SWITCH POSITION	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1	Power Operation	Run	NA
2	Startup	Refuel[(a)] or Startup/Hot Standby	NA
3	Hot Shutdown[(a)]	Shutdown	> 212
4	Cold Shutdown[(a)]	Shutdown	≤ 212
5	Refueling[(b)]	Shutdown or Refuel	NA

(a) All reactor vessel head closure bolts fully tensioned.

(b) One or more reactor vessel head closure bolts less than fully tensioned.

3.3 INSTRUMENTATION

3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

LCO 3.3.5.1 The ECCS instrumentation for each Function in Table 3.3.5.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.1-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.5.1-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	B.1 ----------NOTE---------- Only applicable for Functions 1.a, 1.b, 2.a, and 2.b. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable. AND	1 hour from discovery of loss of initiation capability for feature(s) in both divisions (continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.2	----------NOTE---------- Only applicable for Functions 3.a and 3.b. ---------- Declare High Pressure Coolant Injection (HPCI) System inoperable. AND	1 hour from discovery of loss of HPCI initiation capability
	B.3	Place channel in trip.	24 hours
C. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	C.1	----------NOTE---------- Only applicable for Functions 1.c, 1.d, 2.c, 2.d, and 2.f. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable. AND	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	C.2	Restore channel to OPERABLE status.	24 hours

(continued)

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
d. Core Spray Pump Start—Time Delay Relay	1,2,3	2 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 14 seconds and ≤ 16 seconds
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)	1[(a)],2[(a)], 3[(a)]	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 302 psig
e. Reactor Vessel Shroud Level	1,2,3	2	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -50 inches
f. RHR Pump Start—Time Delay Relay	1,2,3	4 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 9 seconds and ≤ 11 seconds
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level—Low Level 2	1 2[(b)], 3[(b)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 101 inches
b. Drywell Pressure—High	1, 2[(b)],3[(b)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

(a) With associated recirculation pump discharge valve or recirculation pump discharge bypass valve open.

(b) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCI System (continued)					
c. Reactor Vessel Water Level—High	1, 2[(b)], 3[(b)]	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 207 inches
d. Condensate Storage Tank Level—Low	1, 2[(b)], 3[(b)]	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 23 feet 4 inches
e. Suppression Chamber Water Level—High	1, 2[(b)], 3[(b)]	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤-2 feet
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level—Low Level 3	1, 2[(b)], 3[(b)]	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2[(b)], 3[(b)]	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2[(b)], 3[(b)]	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

(continued)

(b) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 4 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. ADS Trip System B					
a. Reactor Vessel Water Level—Low Level 3	1, 2[(b)], 3[(b)]	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2[(b)], 3[(b)]	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2[(b)], 3[(b)]	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

(b) With reactor steam dome pressure > 150 psig.

3.3 INSTRUMENTATION

3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

LCO 3.3.5.3 The RPV Water Inventory Control instrumentation for each Function in Table 3.3.5.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.3-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more channels inoperable.	A.1	Enter the Condition referenced in Table 3.3.5.3-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	B.1	Declare associated penetration flow path(s) incapable of automatic isolation.	Immediately
	AND		
	B.2	Calculate DRAIN TIME.	Immediately
C. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	C.1	Place channel in trip.	1 hour

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C or D not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTES---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	I.1 Declare associated standby liquid control subsystem (SLC) inoperable. OR I.2 Isolate the Reactor Water Cleanup (RWCU) System.	1 hour 1 hour
J. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	J.1 Initiate action to restore channel to OPERABLE status.	Immediately

Table 3.3.6.1-1 (page 5 of 5)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
6. RHR Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure—High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 137 psig
b. Reactor Vessel Water Level— Low Level 1	3	2	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
7. Traversing In-core Probe Isolation					
a. Reactor Vessel Water Level – Low Level 1	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≤ 1.8 psig

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level—Low Level 2	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≥ 101 inches
2. Drywell Pressure—High	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 1.8 psig
3. Reactor Building Exhaust Radiation—High	1,2,3 (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 16 mR/hr

(a) During movement of recently irradiated fuel assemblies in secondary containment.

Table 3.3.7.1-1 (page 1 of 1)
Control Room Emergency Ventilation (CREV) System Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Control Building Air Intake Radiation - High	1, 2, 3 (a)	2	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	≤ 27 mR/hr
2. Unit 1 Secondary Containment Isolation - CREV Auto-Start	1, 2, 3	2	SR 3.3.6.2.2 SR 3.3.6.2.5	(b)

(a) During movement of recently irradiated fuel assemblies in secondary containment.

(b) The auto-start signal is provided from Secondary Containment Isolation logic and does not depend on a specific instrument; for Secondary Containment Isolation Instrumentation, refer to Table 3.3.6.2-1.

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS—Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable. OR One low pressure coolant injection (LPCI) pump in each subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. One LPCI pump inoperable. AND One core spray (CS) subsystem inoperable.	B.1 Restore LPCI pump to OPERABLE status. OR B.2 Restore CS subsystem to OPERABLE status.	72 hours 72 hours

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 Reactor Pressure Vessel (RPV) Water Inventory Control

LCO 3.5.2 DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be ≥ 36 hours.

AND

One low pressure ECCS injection/spray subsystem shall be OPERABLE.

----------NOTE----------
A 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.

APPLICABILITY: MODES 4 and 5

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to establish a method of water injection capable of operating without offsite electrical power.	Immediately
C. DRAIN TIME < 36 hours and ≥ 8 hours.	C.1 Verify secondary containment boundary is capable of being established in less than the DRAIN TIME. AND	4 hours (continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. (continued)	C.2	Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME.	4 hours
	AND		
	C.3	Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours
D. DRAIN TIME < 8 hours.	D.1	----------NOTE---------- Required ECCS injection/spray subsystem or additional method of water injection shall be capable of operating without offsite electrical power. ----------	
		Initiate action to establish an additional method of water injection with water sources capable of maintaining RPV water level > TAF for ≥ 36 hours.	Immediately
	AND		
	D.2	Initiate action to establish secondary containment boundary.	Immediately
	AND		

(continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. (continued)	D.3	Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
	AND		
	D.4	Initiate action to verify one standby gas treatment subsystem is capable of being placed in operation.	Immediately
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore Drain Time to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.2	Verify, for a required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.3	Verify, for a required core spray (CS) subsystem, the: a. Suppression pool water level is ≥ -31 inches; or b. Condensate storage tank water volume is ≥ 228,200 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTE---------- Not required to be met for system vent flow paths opened under administrative control. ---------- Verify for the required ECCS injection/spray subsystem each 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.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RCIC System inoperable.	A.1	Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately
	AND		
	A.2	Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.5.3.1	Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
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.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.3	----------NOTE---------- 1. Use of auxiliary steam for the performance of the SR is not allowed. 2. Not required to be performed until 24 hours after reactor steam pressure is adequate to perform the test. ----------	
	Verify, with reactor pressure $\geq$ 945 psig and $\leq$ 1045 psig, the RCIC pump can develop a flow rate $\geq$ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.3.4	----------NOTES---------- 1. Use of auxiliary steam for the performance of the SR is not allowed with reactor pressure ≥ 150 psig. 2. Not required to be performed until 24 hours after reactor steam pressure is adequate to perform the test. --- Verify, with turbine inlet pressure ≥ 135 psig and ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to an equivalent reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. --- Verify the RCIC System actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One or more penetration flow paths with one or more MSIVs not within MSIV leakage rate limits.	D.1	Restore leakage rate to within limit.	8 hours
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1	Be in MODE 3.	12 hours
	AND		
	E.2	Be in MODE 4.	36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	F.1	Initiate action to restore valve(s) to OPERABLE status.	Immediately

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1	Restore secondary containment to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Be in MODE 4.	36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.2	Verify one secondary containment access door is closed in each access opening.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.3	Verify each SGT subsystem can maintain $\geq$ 0.25 inch of vacuum water gauge in the secondary containment for 1 hour at a flow rate $\leq$ 3000 cfm.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)

LCO 3.6.4.2 Each SCID shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

---NOTES---

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIDs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one SCID inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange. AND	8 hours (continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of recently irradiated fuel assemblies in the secondary containment.	D.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.2.1	Verify the isolation time of each automatic SCID is within limits.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.2.2	Verify each automatic SCID actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable in MODE 1, 2 or 3.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met. OR Two SGT subsystems inoperable in MODE 1, 2, or 3.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One SGT subsystem inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1 Restore SGT subsystem to OPERABLE status.	31 days
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE SGT subsystem in operation.	Immediately
	OR	
	D.2 Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	E.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

----------NOTE----------
The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREV subsystem inoperable for reasons other than Condition B.	A.1	Restore CREV subsystem to OPERABLE status.	7 days
B. One or more CREV subsystems inoperable due to inoperable CRE Boundary in Mode 1, 2, or 3.	B.1	Initiate action to implement mitigating actions.	Immediately
	AND		
	B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	AND		
	B.3	Restore CRE boundary to Operable status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. OR Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE CREV subsystem in radiation/smoke protection mode. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS.	 Immediately Immediately Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more CREV subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- E.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND E.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CREV subsystem for $\geq$ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2	Perform required CREV filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,

During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1	Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1	Restore one inoperable control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1	Be in MODE 3.	12 hours
	AND		
	C.2	Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE control room AC subsystem(s) in operation. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS.	Immediately Immediately Immediately
E. Three control room AC subsystems inoperable in MODE 1, 2, or 3.	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Three control room AC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	 Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify each control room AC subsystem has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ACTIONS

----------NOTE----------
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required offsite circuits inoperable.	----------NOTE---------- Enter applicable Condition and Required Actions of LCO 3.8.8, with one or more required 4.16 kV emergency buses de-energized as a result of Condition A. --- A.1 Declare affected required feature(s), with no offsite power available, inoperable. OR A.2.1 Suspend CORE ALTERATIONS. AND A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	Immediately Immediately Immediately

(continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2.3	Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. One required DG inoperable.	B.1	Declare affected required feature(s) with no DG available inoperable.	Immediately
	OR		
	B.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	B.2.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	B.2.3	Initiate action to restore required DG to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Two required DGs inoperable.	C.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	C.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	C.3	Initiate action to restore required DGs to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	----------NOTE---------- Unless required to be performed by Unit 2 Specification 3.8.1, the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13, and SR 3.8.1.14. ----------	
	For AC sources required to be OPERABLE the SRs of Specification 3.8.1, except SR 3.8.1.8 and SR 3.8.1.12, are applicable.	In accordance with applicable SRs

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	Immediately
	A.2.3 Initiate action to restore required DC electrical power subsystems to OPERABLE status.	Immediately

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2.3	Initiate actions to restore required AC and DC electrical power distribution subsystems to OPERABLE status.	Immediately
	AND		
	A.2.4	Declare associated required shutdown cooling subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	Verify correct breaker alignments and indicated power availability to required AC and DC electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

Revised Technical Specifications Pages - Unit 2

1.1 Definitions

DOSE EQUIVALENT I-131 (continued)	Submersion, and Ingestion," 1989 and FGR 12, "External Exposure to Radionuclides in Air, Water, and Soil," 1993.
DRAIN TIME	The DRAIN TIME is the time it would take for the water inventory in and above the Reactor Pressure Vessel (RPV) to drain to the top of the active fuel (TAF) seated in the RPV assuming: a) The water inventory above the TAF is divided by the limiting drain rate; b) The limiting drain rate is the larger of the drain rate through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error), for all penetration flow paths below the TAF except: 1. Penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths; 2. Penetration flow paths capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation; or 3. Penetration flow paths with isolation devices that can be closed prior to the RPV water level being equal to the TAF by a dedicated operator trained in the task, who in continuous communication with the control room, is stationed at the controls, and is capable of closing the penetration flow path isolation device without offsite power. c) The penetration flow paths required to be evaluated per paragraph b) are assumed to open instantaneously and are not subsequently isolated, and no water is assumed to be subsequently added to the RPV water inventory;

(continued)

1.1 Definitions

DRAIN TIME (continued)	d) No additional draining events occur; and e) Realistic cross-sectional areas and drain rates are used. A bounding DRAIN TIME may be used in lieu of a calculated value.
EMERGENCY CORE COOLING SYSTEM (ECCS) RESPONSE TIME	The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
ISOLATION INSTRUMENTATION RESPONSE TIME	The ISOLATION INSTRUMENTATION RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves receive the isolation signal (e.g., de-energization of the MSIV solenoids). The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
LEAKAGE	LEAKAGE shall be: a. <u>Identified LEAKAGE</u> 1. LEAKAGE into the drywell, such as that from pump seals or valve packing, that is captured and conducted to a sump or collecting tank; or 2. LEAKAGE into the drywell atmosphere from sources that are both specifically located and known either not to interfere with the operation of leakage detection systems or not to be pressure boundary LEAKAGE;

(continued)

1.1 Definitions

LEAKAGE (continued)	b. <u>Unidentified LEAKAGE</u> All LEAKAGE into the drywell that is not identified LEAKAGE; c. <u>Total LEAKAGE</u> Sum of the identified and unidentified LEAKAGE; and d. <u>Pressure Boundary LEAKAGE</u> LEAKAGE through a nonisolable fault in a Reactor Coolant System (RCS) component body, pipe wall, or vessel wall.
LINEAR HEAT GENERATION RATE (LHGR)	The LHGR shall be the heat generation rate per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.
LOGIC SYSTEM FUNCTIONAL TEST	A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all required logic components (i.e., all required relays and contacts, trip units, solid state logic elements, etc.) of a logic circuit, from as close to the sensor as practicable up to, but not including, the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total system steps so that the entire logic system is tested.
MINIMUM CRITICAL POWER RATIO (MCPR)	The MCPR shall be the smallest critical power ratio (CPR) that exists in the core. The CPR is that power in the assembly that is calculated by application of the appropriate correlation(s) to cause some point in the assembly to experience boiling transition, divided by the actual assembly operating power.
MODE	A MODE shall correspond to any one inclusive combination of mode switch position, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.

(continued)

1.1 Definitions (continued)

OPERABLE-OPERABILITY	A system, subsystem, division, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of 2923 MWt.
REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME	The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
SHUTDOWN MARGIN (SDM)	SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that: a. The reactor is xenon free; b. The moderator temperature is 68°F; and c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

(continued)

1.1 Definitions (continued)

STAGGERED TEST BASIS	A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during *n* Surveillance Frequency intervals, where *n* is the total number of systems, subsystems, channels, or other designated components in the associated function.
THERMAL POWER	THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.
TURBINE BYPASS SYSTEM RESPONSE TIME	The TURBINE BYPASS SYSTEM RESPONSE TIME consists of two components: a. The time from initial movement of the main turbine stop valve or control valve until 80% of the turbine bypass capacity is established; and b. The time from initial movement of the main turbine stop valve or control valve until initial movement of the turbine bypass valve. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

Table 1.1-1 (page 1 of 1)
MODES

MODE	TITLE	REACTOR MODE SWITCH POSITION	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1	Power Operation	Run	NA
2	Startup	Refuel[(a)] or Startup/Hot Standby	NA
3	Hot Shutdown[(a)]	Shutdown	> 212
4	Cold Shutdown[(a)]	Shutdown	≤ 212
5	Refueling[(b)]	Shutdown or Refuel	NA

(a) All reactor vessel head closure bolts fully tensioned.

(b) One or more reactor vessel head closure bolts less than fully tensioned.

3.3 INSTRUMENTATION

3.3.5.1 Emergency Core Cooling System (ECCS) Instrumentation

LCO 3.3.5.1 The ECCS instrumentation for each Function in Table 3.3.5.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.1-1.

ACTIONS

----------NOTE----------

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more channels inoperable.	A.1 Enter the Condition referenced in Table 3.3.5.1-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	B.1 ----------NOTE---------- Only applicable for Functions 1.a, 1.b, 2.a, and 2.b. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable. AND	1 hour from discovery of loss of initiation capability for feature(s) in both divisions (continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
B. (continued)	B.2	----------NOTE---------- Only applicable for Functions 3.a and 3.b. ---------- Declare High Pressure Coolant Injection (HPCI) System inoperable.	1 hour from discovery of loss of HPCI initiation capability
	AND		
	B.3	Place channel in trip.	24 hours
C. As required by Required Action A.1 and referenced in Table 3.3.5.1-1.	C.1	----------NOTE---------- Only applicable for Functions 1.c, 1.d, 2.c, 2.d, and 2.f. ---------- Declare supported feature(s) inoperable when its redundant feature ECCS initiation capability is inoperable.	1 hour from discovery of loss of initiation capability for feature(s) in both divisions
	AND		
	C.2	Restore channel to OPERABLE status.	24 hours

(continued)

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
d. Core Spray Pump Start—Time Delay Relay	1,2,3	2 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 14 seconds and ≤ 16 seconds
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level—Low Level 3	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. Drywell Pressure—High	1,2,3	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI System (continued)					
c. Reactor Steam Dome Pressure—Low	1,2,3	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 402 psig and ≤ 425 psig
d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)	1[(a)],2[(a)], 3[(a)]	4	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 302 psig
e. Reactor Vessel Shroud Level	1,2,3	2	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ -50 inches
f. RHR Pump Start—Time Delay Relay	1,2,3	4 1 per pump	C	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 9 seconds and ≤ 11 seconds
3. High Pressure Coolant Injection (HPCI) System					
a. Reactor Vessel Water Level—Low Level 2	1, 2[(b)], 3[(b)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 101 inches
b. Drywell Pressure—High	1, 2[(b)],3[(b)]	4	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 1.8 psig

(continued)

(a) With associated recirculation pump discharge valve or recirculation pump discharge bypass valve open.

(b) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCI System (continued)					
c. Reactor Vessel Water Level—High	1, 2[(b)], 3[(b)]	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≤ 207 inches
d. Condensate Storage Tank Level—Low	1, 2[(b)], 3[(b)]	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 23 feet 4 inches
e. Suppression Chamber Water Level—High	1, 2[(b)], 3[(b)]	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≤-2 feet
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level—Low Level 3	1, 2[(b)], 3[(b)]	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2[(b)], 3[(b)]	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2[(b)], 3[(b)]	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

(continued)

(b) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 4 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. ADS Trip System B					
a. Reactor Vessel Water Level—Low Level 3	1, 2[(b)], 3[(b)]	2	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 13 inches
b. ADS Timer	1, 2[(b)], 3[(b)]	1	F	SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6	≤ 108 seconds
c. Reactor Vessel Water Level—Low Level 1	1, 2[(b)], 3[(b)]	1	E	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 153 inches
d. Core Spray Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	2	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig
e. RHR (LPCI Mode) Pump Discharge Pressure—High	1, 2[(b)], 3[(b)]	4 2 per pump	F	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5	≥ 102 psig and ≤ 130 psig

(b) With reactor steam dome pressure > 150 psig.

3.3 INSTRUMENTATION

3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

LCO 3.3.5.3 The RPV Water Inventory Control instrumentation for each Function in Table 3.3.5.3-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.5.3-1.

ACTIONS

---NOTE---
Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more channels inoperable.	A.1	Enter the Condition referenced in Table 3.3.5.3-1 for the channel.	Immediately
B. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	B.1	Declare associated penetration flow path(s) incapable of automatic isolation.	Immediately
	AND		
	B.2	Calculate DRAIN TIME.	Immediately
C. As required by Required Action A.1 and referenced in Table 3.3.5.3-1.	C.1	Place channel in trip.	1 hour

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C or D not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTES---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 402 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
I. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	I.1 Declare associated standby liquid control subsystem (SLC) inoperable. OR I.2 Isolate the Reactor Water Cleanup (RWCU) System.	1 hour 1 hour
J. As required by Required Action C.1 and referenced in Table 3.3.6.1-1.	J.1 Initiate action to restore channel to OPERABLE status.	Immediately

Table 3.3.6.1-1 (page 5 of 5)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
6. RHR Shutdown Cooling System Isolation					
a. Reactor Steam Dome Pressure—High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.7	≤ 137 psig
b. Reactor Vessel Water Level— Low Level 1	3	2	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
7. Traversing In-core Probe Isolation					
a. Reactor Vessel Water Level - Low Level 1	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≥ 153 inches
b. Drywell Pressure - High	1,2,3	2	G	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.3 SR 3.3.6.1.6 SR 3.3.6.1.7	≤ 1.8 psig

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level—Low Level 2	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≥ 101 inches
2. Drywell Pressure—High	1,2,3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.3 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 1.8 psig
3. Reactor Building Exhaust Radiation—High	1,2,3 (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5	≤ 16 mR/hr

(a) During movement of recently irradiated fuel assemblies in secondary containment.

Table 3.3.7.1-1 (page 1 of 1)
Control Room Emergency Ventilation (CREV) System Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Control Building Air Intake Radiation - High	1, 2, 3 (a)	2	SR 3.3.7.1.1 SR 3.3.7.1.2 SR 3.3.7.1.3 SR 3.3.7.1.4	≤ 27 mR/hr
2. Unit 2 Secondary Containment Isolation - CREV Auto-Start	1, 2, 3	2	SR 3.3.6.2.2 SR 3.3.6.2.5	(b)

(a) During movement of recently irradiated fuel assemblies in secondary containment.

(b) The auto-start signal is provided from Secondary Containment Isolation logic and does not depend on a specific instrument; for Secondary Containment Isolation Instrumentation, refer to Table 3.3.6.2-1.

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS—Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3, except high pressure coolant injection (HPCI) and ADS valves are not required to be OPERABLE with reactor steam dome pressure ≤ 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to HPCI.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable. OR One low pressure coolant injection (LPCI) pump in each subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. One LPCI pump inoperable. AND One core spray (CS) subsystem inoperable.	B.1 Restore LPCI pump to OPERABLE status. OR B.2 Restore CS subsystem to OPERABLE status.	72 hours 72 hours

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 Reactor Pressure Vessel (RPV) Water Inventory Control

LCO 3.5.2 DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be ≥ 36 hours.

AND

One low pressure ECCS injection/spray subsystem shall be OPERABLE.

----------NOTE----------
A 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.

APPLICABILITY: MODES 4 and 5

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to establish a method of water injection capable of operating without offsite electrical power.	Immediately
C. DRAIN TIME < 36 hours and ≥ 8 hours.	C.1 Verify secondary containment boundary is capable of being established in less than the DRAIN TIME. AND	4 hours (continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. (continued)	C.2	Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME.	4 hours
	AND		
	C.3	Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours
D. DRAIN TIME < 8 hours.	D.1	----------NOTE---------- Required ECCS injection/spray subsystem or additional method of water injection shall be capable of operating without offsite electrical power. ----------	
		Initiate action to establish an additional method of water injection with water sources capable of maintaining RPV water level > TAF for ≥ 36 hours.	Immediately
	AND		
	D.2	Initiate action to establish secondary containment boundary.	Immediately
	AND		

(continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. (continued)	D.3	Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
	AND		
	D.4	Initiate action to verify one standby gas treatment subsystem is capable of being placed in operation.	Immediately
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore Drain Time to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.2	Verify, for a required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.3	Verify, for a required core spray (CS) subsystem, the: a. Suppression pool water level is ≥ -31 inches; or b. Condensate storage tank water volume is ≥ 228,200 gallons.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.4	Verify, for the required ECCS injection/spray subsystem, locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.5	----------NOTE---------- Not required to be met for system vent flow paths opened under administrative control. ---------- Verify for the required ECCS injection/spray subsystem each 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.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.6	Operate the required ECCS injection/spray subsystem through the recirculation line for ≥ 10 minutes.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.2.7	Verify each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated isolation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.8	----------NOTE---------- Vessel injection/spray may be excluded. ---------- Verify the required ECCS injection/spray subsystem can be manually operated.	In accordance with the Surveillance Frequency Control Program

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,

MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

---NOTE---
LCO 3.0.4.b is not applicable to RCIC.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. RCIC System inoperable.	A.1	Verify by administrative means High Pressure Coolant Injection System is OPERABLE.	Immediately
	AND		
	A.2	Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.5.3.1	Verify the RCIC System locations susceptible to gas accumulation are sufficiently filled with water.	In accordance with the Surveillance Frequency Control Program
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.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.3	----------NOTES---------- 1. Use of auxiliary steam for the performance of the SR is not allowed. 2. Not required to be performed until 24 hours after reactor steam pressure is adequate to perform the test. ----------	
	Verify, with reactor pressure $\geq$ 945 psig and $\leq$ 1045 psig, the RCIC pump can develop a flow rate $\geq$ 400 gpm against a system head corresponding to reactor pressure.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.5.3.4	----------NOTES---------- 1. Use of auxiliary steam for the performance of the SR is not allowed with reactor pressure ≥ 150 psig. 2. Not required to be performed until 24 hours after reactor steam pressure is adequate to perform the test. ----------	
	Verify, with turbine inlet pressure ≥ 135 psig and ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 400 gpm against a system head corresponding to an equivalent reactor pressure.	In accordance with the Surveillance Frequency Control Program
SR 3.5.3.5	----------NOTE---------- Vessel injection may be excluded. ----------	
	Verify the RCIC System actuates on an actual or simulated automatic initiation signal.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. One or more penetration flow paths with one or more MSIVs not within MSIV leakage rate limits.	D.1	Restore leakage rate to within limit.	8 hours
E. Required Action and associated Completion Time of Condition A, B, C, or D not met in MODE 1, 2, or 3.	E.1	Be in MODE 3.	12 hours
	AND		
	E.2	Be in MODE 4.	36 hours
F. Required Action and associated Completion Time of Condition A, B, C, or D not met for PCIV(s) required to be OPERABLE during MODE 4 or 5.	F.1	Initiate action to restore valve(s) to OPERABLE status.	Immediately

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1	Restore secondary containment to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1	Be in MODE 3.	12 hours
	AND		
	B.2	Be in MODE 4.	36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.1.1	Verify all secondary containment equipment hatches are closed and sealed.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.2	Verify one secondary containment access door is closed in each access opening.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.1.3	Verify each SGT subsystem can maintain $\geq$ 0.25 inch of vacuum water gauge in the secondary containment for 1 hour at a flow rate $\leq$ 3000 cfm.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Dampers (SCIDs)

LCO 3.6.4.2 Each SCID shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

---NOTES---

1. Penetration flow paths may be unisolated intermittently under administrative controls.
2. Separate Condition entry is allowed for each penetration flow path.
3. Enter applicable Conditions and Required Actions for systems made inoperable by SCIDs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one SCID inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic damper, closed manual damper, or blind flange. AND	8 hours (continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of recently irradiated fuel assemblies in the secondary containment.	D.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.2.1	Verify the isolation time of each automatic SCID is within limits.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.2.2	Verify each automatic SCID actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of recently irradiated fuel assemblies in the secondary containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable in MODE 1, 2 or 3.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met. OR Two SGT subsystems inoperable in MODE 1, 2, or 3.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One SGT subsystem inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1 Restore SGT subsystem to OPERABLE status.	31 days
D. Required Action and associated Completion Time of Condition C not met.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE SGT subsystem in operation.	Immediately
	OR	
	D.2 Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two SGT subsystems inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	E.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Suspend movement of recently irradiated fuel assemblies in secondary containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.4.3.1	Operate each SGT subsystem for ≥ 15 continuous minutes with heaters operating.	In accordance with the Surveillance Frequency Control Program
SR 3.6.4.3.2	Perform required SGT filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP
SR 3.6.4.3.3	Verify each SGT subsystem actuates on an actual or simulated initiation signal.	In accordance with the Surveillance Frequency Control Program

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation (CREV) System

LCO 3.7.3 Two CREV subsystems shall be OPERABLE.

----------NOTE----------
The main control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One CREV subsystem inoperable for reasons other than Condition B.	A.1	Restore CREV subsystem to OPERABLE status.	7 days
B. One or more CREV subsystems inoperable due to inoperable CRE Boundary in Mode 1, 2, or 3.	B.1	Initiate action to implement mitigating actions.	Immediately
	AND		
	B.2	Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	AND		
	B.3	Restore CRE boundary to Operable status.	90 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3. OR Two CREV subsystems inoperable in MODE 1, 2, or 3 for reasons other than Condition B.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- D.1 Place OPERABLE CREV subsystem in radiation/smoke protection mode. OR D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND D.2.2 Suspend CORE ALTERATIONS.	 Immediately Immediately Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two CREV subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS. OR One or more CREV subsystems inoperable due to an inoperable CRE boundary during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- E.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND E.2 Suspend CORE ALTERATIONS.	Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Operate each CREV subsystem for $\geq$ 15 continuous minutes.	In accordance with the Surveillance Frequency Control Program
SR 3.7.3.2	Perform required CREV filter testing in accordance with the Ventilation Filter Testing Program (VFTP).	In accordance with the VFTP

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Three control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,

During movement of irradiated fuel assemblies in the secondary containment,

During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1	Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1	Restore one inoperable control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1	Be in MODE 3.	12 hours
	AND		
	C.2	Be in MODE 4.	36 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A or B not met during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE control room AC subsystem(s) in operation.	Immediately
	OR	
	D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	D.2.2 Suspend CORE ALTERATIONS.	Immediately
E. Three control room AC subsystems inoperable in MODE 1, 2, or 3.	E.1 Enter LCO 3.0.3.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Three control room AC subsystems inoperable during movement of irradiated fuel assemblies in the secondary containment or during CORE ALTERATIONS.	----------NOTE---------- LCO 3.0.3 is not applicable. ---------- F.1 Suspend movement of irradiated fuel assemblies in the secondary containment. AND F.2 Suspend CORE ALTERATIONS.	 Immediately Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.4.1	Verify each control room AC subsystem has the capability to remove the assumed heat load.	In accordance with the Surveillance Frequency Control Program

ACTIONS

----------NOTE----------
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required offsite circuits inoperable.	----------NOTE---------- Enter applicable Condition and Required Actions of LCO 3.8.8, with one or more required 4.16 kV emergency buses de-energized as a result of Condition A. --- A.1 Declare affected required feature(s), with no offsite power available, inoperable. OR A.2.1 Suspend CORE ALTERATIONS. AND A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	 Immediately Immediately Immediately

(continued)

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2.3	Initiate action to restore required offsite power circuit to OPERABLE status.	Immediately
B. One required DG inoperable.	B.1	Declare affected required feature(s) with no DG available inoperable.	Immediately
	OR		
	B.2.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	B.2.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	B.2.3	Initiate action to restore required DG to OPERABLE status.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. Two required DGs inoperable.	C.1	Suspend CORE ALTERATIONS.	Immediately
	AND		
	C.2	Suspend movement of irradiated fuel assemblies in secondary containment.	Immediately
	AND		
	C.3	Initiate action to restore required DGs to OPERABLE status.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.2.1	----------NOTE---------- Unless required to be performed by Unit 1 Specification 3.8.1, the following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, SR 3.8.1.13, and SR 3.8.1.14. ----------	
	For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, except SR 3.8.1.8 and SR 3.8.1.12, are applicable.	In accordance with applicable SRs

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.2.2 Suspend movement of irradiated fuel assemblies in the secondary containment. AND	Immediately
	A.2.3 Initiate action to restore required DC electrical power subsystems to OPERABLE status.	Immediately

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. (continued)	A.2.3	Initiate actions to restore required AC and DC electrical power distribution subsystems to OPERABLE status.	Immediately
	AND		
	A.2.4	Declare associated required shutdown cooling subsystem(s) inoperable and not in operation.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.8.1	Verify correct breaker alignments and indicated power availability to required AC and DC electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

Proposed Technical Specification Bases Changes (Mark-Up) - Unit 1
(For Information Only)

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BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Allowable Values are specified for each ECCS Function specified in the table. Trip setpoints are specified in the setpoint calculations. The setpoints are selected to ensure that the trip settings do not exceed the Allowable Value between CHANNEL CALIBRATIONS. Operation with a trip setting less conservative than the trip setpoint, but within its Allowable Value, is acceptable. A channel is inoperable if its actual trip setting is not within its required Allowable Value. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor vessel water level), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The trip setpoints are determined from the analytic limits, corrected for defined process, calibration, and instrument errors. The Allowable Values are then determined, based on the trip setpoint values, by accounting for calibration based errors. These calibration based errors are limited to instrument drift, errors associated with measurement and test equipment, and calibration tolerance of loop components. The trip setpoints and Allowable Values determined in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for and appropriately applied for the instrumentation.

In general, the individual Functions are required to be OPERABLE in the MODES or other specified conditions that may require ECCS (or DG) initiation to mitigate the consequences of a design basis transient or accident. Table 3.3.5.1-1 footnotes (a)~~,~~ and (b)~~, and (c)~~ specifically indicate other conditions when certain ECCS Instrumentation Functions are required to be OPERABLE. To ensure reliable ECCS and DG function, a combination of Functions is required to provide primary and secondary initiation signals.

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Core Spray and Low Pressure Coolant Injection Systems

1.a, 2.a. Reactor Vessel Water Level—Low Level 3

Low reactor pressure vessel (RPV) water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. The low pressure ECCS and associated DGs are initiated at Reactor Vessel Water Level—Low Level 3 to ensure that core spray and flooding functions are available to prevent or minimize fuel damage. The Reactor Vessel Water Level—Low Level 3 is one of the Functions assumed to be OPERABLE and capable of initiating the ECCS and associated DGs during the transients analyzed in References 1 and 3. In addition, the Reactor Vessel Water Level—Low Level 3 Function is directly assumed in the analysis of the recirculation line break. The core cooling function of the ECCS, along with the scram action of the Reactor Protection System (RPS), ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

Reactor Vessel Water Level—Low Level 3 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel.

The Reactor Vessel Water Level—Low Level 3 Allowable Value is chosen to allow time for the low pressure core flooding systems to activate and provide adequate cooling. The Allowable Value is referenced from reference level zero. Reference level zero is 367 inches above the vessel zero point.

Four channels of Reactor Vessel Water Level—Low Level 3 Function are only required to be OPERABLE when the ECCS or DG(s) are required to be OPERABLE to ensure that no single instrument failure can preclude ECCS and DG initiation. ~~Refer to LCO 3.5.1 and LCO 3.5.2, "ECCS—Shutdown," for Applicability Bases for the low pressure ECCS subsystems; and LCO 3.8.1 and LCO 3.8.2, "AC Sources—Shutdown," for Applicability Bases for the DGs.~~

1.b, 2.b. Drywell Pressure—High

High pressure in the drywell could indicate a break in the reactor coolant pressure boundary (RCPB). The low pressure ECCS and associated

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

1.c, 2.c. Reactor Steam Dome Pressure—Low (continued)

Pressure—Low Function is directly assumed in the analysis of the recirculation line break. The core cooling function of the ECCS, along with the scram action of the RPS, ensures that the fuel peak cladding temperature remains below the limits of 10 CFR 50.46.

The Reactor Steam Dome Pressure—Low signals are initiated from four pressure transmitters that sense the reactor dome pressure.

The Allowable Value is low enough to prevent overpressuring the equipment in the low pressure ECCS, but high enough to ensure that the ECCS injection prevents the fuel peak cladding temperature from exceeding the limits of 10 CFR 50.46.

Four channels of Reactor Steam Dome Pressure—Low Function are only required to be OPERABLE when the ECCS or DG(s) are required to be OPERABLE to ensure that no single instrument failure can preclude ECCS and DG initiation. Refer to LCO 3.5.1 ~~and LCO 3.5.2~~ for Applicability Bases for the low pressure ECCS subsystems; and LCO 3.8.1 ~~and LCO 3.8.2~~ for Applicability Bases for the DGs.

1.d, 2.f. Core Spray and RHR Pump Start—Time Delay Relays

The purpose of these time delays is to stagger the start of the CS and RHR pumps that are in each of Divisions I and II, thus limiting the starting transients on the 4.16 kV emergency buses. These Functions are necessary when power is being supplied from either the normal power sources (offsite power) or the standby power sources (DGs). The Core Spray Pump Start—Time Delay Relays and the RHR Pump Start—Time Delay Relays are assumed to be OPERABLE in the accident and transient analyses requiring ECCS initiation. That is, the analyses assume that the pumps will initiate when required and excess loading will not cause failure of the power sources.

There are eight RHR Pump Start—Time Delay Relays, two channels in each of the RHR pump start logic circuits. There are six CS pump start timers arranged such that there are four separate channels of the Core Spray Pump Start Time—Delay Relay Function, two channels in each of the CS pump start logic circuits. Each channel consists of an individual

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

1.d, 2.f. Core Spray and RHR Pump Start—Time Delay Relays

10 second timer and a 5 second timer. The 5 second timer is common to both channels associated with a CS pump start logic circuit. Each 10 second timer associated with a CS pump start logic channel is shared with an RHR pump start logic channel.

While two time delay relay channels are dedicated to a single CS pump start logic, a single failure of a 5 second CS pump timer could result in the failure of the two low pressure ECCS pumps, powered from the same 4.16 kV emergency bus, to perform their intended function within the assumed ECCS RESPONSE TIME (e.g., as in the case where both ECCS pumps on one 4.16 kV emergency bus start simultaneously due to an inoperable time delay relay). This still leaves four of the six low pressure ECCS pumps OPERABLE. Additionally, a failure of both shared time delay relay channels in an RHR and CS pump start logic circuit would also leave four of the six low pressure ECCS pumps OPERABLE as described above. As a result, to satisfy the single failure criterion (i.e., loss of one instrument does not preclude ECCS initiation), only one channel per pump of the Core Spray and RHR Pump Start—Time Delay Relay Functions are required to be OPERABLE when the associated ECCS subsystem is required to be OPERABLE. Refer to LCO 3.5.1 ~~and LCO 3.5.2~~ for Applicability Bases for the ECCS subsystems.

The Allowable Values for the Core Spray and RHR Pump Start—Time Delay Relays are chosen to be long enough so that most of the starting transient of the previously started pump is complete before starting a subsequent pump on the same 4.16 kV emergency bus and short enough so that ECCS operation is not degraded.

2.d. Reactor Steam Dome Pressure—Low (Recirculation Pump Discharge Valve Permissive)

Low reactor steam dome pressure signals are used as permissives for recirculation pump discharge valve closure and recirculation pump discharge bypass valve closure. This ensures that the LPCI subsystems inject into the proper RPV location assumed in the safety analysis. The Reactor Steam Dome Pressure—Low is one of the Functions assumed to

(continued)

BASES

ACTIONS (continued)

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

Required Actions B.1 and B.2 are intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in redundant automatic initiation capability being lost for the feature(s). Required Action B.1 features would be those that are initiated by Functions 1.a, 1.b, 2.a, and 2.b (e.g., low pressure ECCS). The Required Action B.2 system would be HPCI. For Required Action B.1, redundant automatic initiation capability is lost if (a) two Function 1.a channels are inoperable and untripped in the same trip system, (b) two Function 2.a channels are inoperable and untripped in the same trip system, (c) two Function 1.b channels are inoperable and untripped in the same system, or (d) two Function 2.b channels are inoperable and untripped in the same trip system. For low pressure ECCS, since each inoperable channel would have Required Action B.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system of low pressure ECCS and DGs to be declared inoperable. However, since channels in both associated low pressure ECCS subsystems (e.g., both CS subsystems) are inoperable and untripped, and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in the associated low pressure ECCS and DGs being concurrently declared inoperable. For Required Action B.2, redundant automatic initiation capability is lost if two Function 3.a or two Function 3.b channels are inoperable and untripped in the same trip system.

In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action B.3 is not appropriate and the feature(s) associated with the inoperable, untripped channels must be declared inoperable within 1 hour. ~~As noted (Note 1 to Required Action B.1), Required Action B.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the low pressure ECCS is not assumed and the probability of a LOCA is lower. Thus, a total loss of initiation capability for 24 hours (as allowed by Required Action B.3) is allowed during MODES 4 and 5. There is no similar Note provided for Required Action B.2 since HPCI instrumentation is not required in MODES 4 and 5; thus, a Note is not necessary.~~

(continued)

BASES

ACTIONS

B.1, B.2, and B.3 (continued)

Notes are ~~also~~ provided (the Note ~~2~~ to Required Action B.1 and the Note to Required Action B.2) to delineate which Required Action is applicable for each Function that requires entry into Condition B if an associated channel is inoperable. This ensures that the proper loss of initiation capability check is performed. Required Action B.1 (the Required Action for certain inoperable channels in the low pressure ECCS subsystems) is not applicable to Function 2.e, since this Function provides backup to administrative controls ensuring that operators do not divert LPCI flow from injecting into the core when needed. Thus, a total loss of Function 2.e capability for 24 hours is allowed, since the LPCI subsystems remain capable of performing their intended function.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action B.1, the Completion Time only begins upon discovery that a redundant feature in the same system (e.g., both CS subsystems) cannot be automatically initiated due to inoperable, untripped channels within the same Function as described in the paragraph above. For Required Action B.2, the Completion Time only begins upon discovery that the HPCI System cannot be automatically initiated due to two inoperable, untripped channels for the associated Function in the same trip system. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration or tripping of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 7) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, the channel must be placed in the tripped condition per Required Action B.3. Placing the inoperable channel in trip would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue.

(continued)

BASES

ACTIONS

B.1, B.2, and B.3 (continued)

Alternately, if it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an initiation), Condition G must be entered and its Required Action taken.

C.1 and C.2

Required Action C.1 is intended to ensure that appropriate actions are taken if multiple, inoperable channels within the same Function result in redundant automatic initiation capability being lost for the feature(s). Required Action C.1 features would be those that are initiated by Functions 1.c, 1.d, 2.c, 2.d, and 2.f (i.e., low pressure ECCS). Redundant automatic initiation capability is lost if either (a) two Function 1.c channels are inoperable in the same trip system, (b) two Function 2.c channels are inoperable in the same trip system, (c) two Function 2.d channels are inoperable in the same trip system, or (d) two or more required Function 1.d and 2.f channels associated with low pressure ECCS pumps powered from separate 4.16 kV emergency buses are inoperable. Since each inoperable channel would have Required Action C.1 applied separately (refer to ACTIONS Note), each inoperable channel would only require the affected portion of the associated system of low pressure ECCS and DGs to be declared inoperable. However, since channels for both associated low pressure ECCS subsystems are inoperable (e.g., both CS subsystems), and the Completion Times started concurrently for the channels in both subsystems, this results in the affected portions in the associated low pressure ECCS and DGs being concurrently declared inoperable. For Functions 1.d and 2.f, the affected portions are the associated low pressure ECCS pumps.

In this situation (loss of redundant automatic initiation capability), the 24 hour allowance of Required Action C.2 is not appropriate and the feature(s) associated with the inoperable channels must be declared inoperable within 1 hour. ~~As noted (Note 1 to Required Actions C.1), Required Action C.1 is only applicable in MODES 1, 2, and 3. In MODES 4 and 5, the specific initiation time of the ECCS is not assumed and the probability of a LOCA occurring during the period the channels~~

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

~~are inoperable is low. Thus, a total loss of automatic initiation capability for 24 hours (as allowed by Required Action C.2) is allowed during MODES 4 and 5.~~

The Note ~~2~~ to Required Action C.1 states that it is only applicable for Functions 1.c, 1.d, 2.c, 2.d, and 2.f. Required Action C.1 is not applicable to Function 3.c (which also requires entry into this Condition if a channel in this Function is inoperable), since the loss of one channel results in a loss of the Function (two-out-of-two logic). This loss was considered during the development of Reference 7 and considered acceptable for the 24 hours allowed by Required Action C.2.

The Completion Time is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." For Required Action C.1, the Completion Time only begins upon discovery that the same feature in both subsystems (e.g., both CS subsystems) cannot be automatically initiated due to inoperable channels within the same Function as described in the paragraph above. The 1 hour Completion Time from discovery of loss of initiation capability is acceptable because it minimizes risk while allowing time for restoration of channels.

Because of the diversity of sensors available to provide initiation signals and the redundancy of the ECCS design, an allowable out of service time of 24 hours has been shown to be acceptable (Ref. 7) to permit restoration of any inoperable channel to OPERABLE status. If the inoperable channel cannot be restored to OPERABLE status within the allowable out of service time, Condition G must be entered and its Required Action taken. The Required Actions do not allow placing the channel in trip since this action would either cause the initiation or it would not necessarily result in a safe state for the channel in all events.

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B 3.3 INSTRUMENTATION

B 3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

BASES

BACKGROUND

The RPV contains penetrations below the top of the active fuel (TAF) that have the potential to drain the reactor coolant inventory to below the TAF. If the water level should drop below the TAF, the ability to remove decay heat is reduced, which could lead to elevated cladding temperatures and clad perforation. Safety Limit 2.1.1.3 requires the RPV water level to be above the top of the active irradiated fuel at all times to prevent such elevated cladding temperatures.

Technical Specifications are required by 10 CFR 50.36 to include limiting safety system settings (LSSS) for variables that have significant safety functions. LSSS are defined by the regulation as "Where a LSSS is specified for a variable on which a safety limit has been placed, the setting must be chosen so that automatic protective actions will correct the abnormal situation before a Safety Limit (SL) is exceeded." The Analytical Limit is the limit of the process variable at which a safety action is initiated to ensure that a SL is not exceeded. Any automatic protection action that occurs on reaching the Analytical Limit therefore ensures that the SL is not exceeded. However, in practice, the actual settings for automatic protection channels must be chosen to be more conservative than the Analytical Limit to account for instrument loop uncertainties related to the setting at which the automatic protective action would actually occur. The actual settings for the automatic isolation channels are the same as those established for the same functions in MODES 1, 2, and 3 in LCO 3.3.5.1, "Emergency Core Cooling System (ECCS) Instrumentation," or LCO 3.3.6.1, "Primary Containment Isolation instrumentation".

With the unit in MODE 4 or 5, RPV water inventory control is not required to mitigate any events or accidents evaluated in the safety analyses. RPV water inventory control is required in MODES 4 and 5 to protect Safety Limit 2.1.1.3 and the fuel cladding barrier to prevent the release of radioactive material should a draining event occur. Under the definition of DRAIN TIME, some penetration flow paths may be excluded from the DRAIN TIME calculation if they will be isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation.

(continued)

BASES

BACKGROUND (continued)

The purpose of the RPV Water Inventory Control Instrumentation is to support the requirements of LCO 3.5.2, “Reactor Pressure Vessel (RPV) Water Inventory Control,” and the definition of DRAIN TIME. There are functions that are required for manual initiation or operation of the ECCS injection/spray subsystem required to be OPERABLE by LCO 3.5.2 and other functions that support automatic isolation of Residual Heat Removal subsystem and Reactor Water Cleanup system penetration flow path(s) on low RPV water level.

The RPV Water Inventory Control Instrumentation supports operation of core spray (CS) and low pressure coolant injection (LPCI). The equipment involved with each of these systems is described in the Bases for LCO 3.5.2.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

With the unit in MODE 4 or 5, RPV water inventory control is not required to mitigate any events or accidents evaluated in the safety analyses. RPV water inventory control is required in MODES 4 and 5 to protect Safety Limit 2.1.1.3 and the fuel cladding barrier to prevent the release of radioactive material should a draining event occur.

A double-ended guillotine break of the Reactor Coolant System (RCS) is not postulated in MODES 4 and 5 due to the reduced RCS pressure, reduced piping stresses, and ductile piping systems. Instead, an event is postulated in which a single operator error or initiating event allows draining of the RPV water inventory through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error). It is assumed, based on engineering judgment, that while in MODES 4 and 5, one low pressure ECCS injection/spray subsystem can be manually initiated to maintain adequate reactor vessel water level.

As discussed in References 1, 2, 3, 4, and 5, operating experience has shown RPV water inventory to be significant to public health and safety. Therefore, RPV Water Inventory Control satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

Permissive and interlock setpoints are generally considered as nominal values without regard to measurement accuracy.

The specific Applicable Safety Analyses, LCO, and Applicability discussions are listed below on a Function by Function basis.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Core Spray and Low Pressure Coolant Injection Systems

1.a, 2.a Reactor Steam Dome Pressure—Low

Low reactor steam dome pressure signals are used as permissive for the low pressure ECCS injection/spray subsystem manual injection functions. This function ensures that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems' maximum design pressure. While it is assured during MODES 4 and 5 that the reactor steam dome pressure will be below the ECCS maximum design pressure, the Reactor Steam Dome Pressure - Low signals are assumed to be OPERABLE and capable of permitting initiation of the ECCS.

The Reactor Steam Dome Pressure—Low signals are initiated from four pressure transmitters that sense the reactor dome pressure.

The Allowable Value is low enough to prevent overpressuring the equipment in the low pressure ECCS.

The four channels of Reactor Steam Dome Pressure—Low Function are required to be OPERABLE in MODES 4 and 5 when manual operation is required to be OPERABLE by LCO 3.5.2.

RHR System Isolation

3.a Reactor Vessel Water Level—Low Level 1

The definition of Drain Time allows crediting the closing of penetration flow paths that are capable of being isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation. The Reactor Vessel Water Level—Low Level 1 Function associated with RHR System isolation may be credited for automatic isolation of penetration flow paths associated with the RHR System.

Reactor Vessel Water Level—Low Level 1 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. While four channels (two channels per trip system) of the Reactor Vessel Water Level - Low, Level 1 Function are available, only two channels (all in the same trip system) are required to be OPERABLE.

The Reactor Vessel Water Level - Low, Level 1 Function is only required to be OPERABLE when automatic isolation of the associated penetration flow path is credited in calculating DRAIN TIME.

This Function isolates the Group 8 valves.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Reactor Water Cleanup (RWCU) System Isolation

4.a Reactor Vessel Water Level—Low Level 2

The definition of DRAIN TIME allows crediting the closing of penetration flow paths that are capable of being automatically isolated by RPV water level isolation instrumentation prior to the RPV water level being equal to the TAF. The Reactor Vessel Water Level—Low Level 2 Function associated with RWCU System isolation may be credited for automatic isolation of penetration flow paths associated with the RWCU System.

Reactor Vessel Water Level—Low Level 2 is initiated from two channels per trip system that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. While four channels (two channels per trip system) of the Reactor Vessel Water Level—Low Level 2 Function are available, only two channels (all in the same trip system) are required to be OPERABLE.

The Reactor Vessel Water Level—Low Level 2 Function is only required to be OPERABLE when automatic isolation of the associated penetration flow path is credited in calculating DRAIN TIME.

This Function isolates the Group 3 valves.

ACTIONS

A Note has been provided to modify the ACTIONS related to RPV Water Inventory Control instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable RPV Water Inventory Control instrumentation channels provide appropriate compensatory measures for separate inoperable Condition entry for each inoperable RPV Water Inventory Control instrumentation channel.

A.1

Required Action A.1 directs entry into the appropriate Condition referenced in Table 3.3.5.2-1. The applicable Condition referenced in the Table is Function dependent. Each time a channel is discovered inoperable, Condition A is entered for that channel and provides for transfer to the appropriate subsequent Condition.

(continued)

BASES

ACTIONS (continued)

B.1 and B.2

RHR System Isolation, Reactor Vessel Water Level—Low Level 1, and Reactor Water Cleanup System, Reactor Vessel Water Level—Low Level 2 functions are applicable when automatic isolation of the associated penetration flow path is credited in calculating DRAIN TIME. If the instrumentation is inoperable, Required Action B.1 directs an immediate declaration that the associated penetration flow path(s) are incapable of automatic isolation. Required Action B.2 directs calculation of DRAIN TIME. The calculation cannot credit automatic isolation of the affected penetration flow paths.

C.1

Low reactor steam dome pressure signals are used as permissives for the low pressure ECCS injection/spray subsystem manual injection functions. If the permissive is inoperable, manual initiation of ECCS is prohibited. Therefore, the permissive must be placed in the trip condition within 1 hour. With the permissive in the trip condition, manual initiation may be performed. Prior to placing the permissive in the tripped condition, the operator can take manual control of the pump and the injection valve to inject water into the RPV.

The Completion Time of 1 hour is intended to allow the operator time to evaluate any discovered inoperabilities and to place the channel in trip.

D.1

With the Required Action and associated Completion Time of Condition C not met, the associated low pressure ECCS injection/spray subsystem may be incapable of performing the intended function, and must be declared inoperable immediately.

SURVEILLANCE REQUIREMENTS

As noted in the beginning of the SRs, the SRs for each RPV Water Inventory Control instrument Function are found in the SRs column of Table 3.3.5.3-1.

SR 3.3.5.3.1

Performance of the CHANNEL CHECK ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.3.1 (continued)

instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK guarantees that undetected outright channel failure is limited; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL FUNCTIONAL TEST.

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

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

The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the channels required by the LCO.

SR 3.3.5.3.2

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL FUNCTIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests.

Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

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

REFERENCES

1. Information Notice 84-81 "Inadvertent Reduction in Primary Coolant Inventory in Boiling Water Reactors During Shutdown and Startup," November 1984.
2. Information Notice 86-74, "Reduction of Reactor Coolant Inventory Because of Misalignment of RHR Valves," August 1986.
3. Generic Letter 92-04, "Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation in BWRs Pursuant to 10 CFR 50.54(F), " August 1992.

(continued)

BASES

REFERENCES (continued)

4. NRC Bulletin 93-03, "Resolution of Issues Related to Reactor Vessel Water Level Instrumentation in BWRs," May 1993.

5. Information Notice 94-52, "Inadvertent Containment Spray and Reactor Vessel Draindown at Millstone 1," July 1994.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

6.a. Reactor Steam Dome Pressure—High (continued)

MODES in which the reactor can be pressurized; thus, equipment protection is needed. The Allowable Value was chosen to be low enough to protect the system equipment from overpressurization.

This Function isolates the Group 8 valves except for the LPCI injection valves E11-F015A and E11-F015B.

6.b. Reactor Vessel Water Level—Low Level 1

Low RPV water level indicates that the capability to cool the fuel may be threatened. Should RPV water level decrease too far, fuel damage could result. Therefore, isolation of some reactor vessel interfaces occurs to begin isolating the potential sources of a break. The Reactor Vessel Water Level—Low Level 1 Function associated with RHR Shutdown Cooling System isolation is not directly assumed in safety analyses because a break of the RHR Shutdown Cooling System is bounded by breaks of the recirculation and MSL. The RHR Shutdown Cooling System isolation on Level 1 supports actions to ensure that the RPV water level does not drop below the top of the active fuel during a vessel draindown event caused by a leak (e.g., pipe break or inadvertent valve opening) in the RHR Shutdown Cooling System.

Reactor Vessel Water Level—Low Level 1 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. Four channels (two channels per trip system) of the Reactor Vessel Water Level—Low Level 1 Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function. ~~As noted (footnote (d) to Table 3.3.6.1-1), only one channel per trip system (with an isolation signal available to one RHR shutdown cooling pump suction isolation valve) of the Reactor Vessel Water Level—Low Level 1 Function is required to be OPERABLE in MODES 4 and 5, provided the RHR Shutdown Cooling System integrity is maintained. System integrity is maintained provided the piping is intact and no maintenance is being performed that has the potential for draining the reactor vessel through the system.~~

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

6.b. Reactor Vessel Water Level—Low Level 1 (continued)

The Reactor Vessel Water Level—Low Level 1 Allowable Value was chosen to be the same as the RPS Reactor Vessel Water Level—Low Level 1 Allowable Value (LCO 3.3.1.1), since the capability to cool the fuel may be threatened. The Allowable Values is referenced from reference level zero. Reference level zero is 367 inches above the vessel zero point.

The Reactor Vessel Water Level—Low Level 1 Function is only required to be OPERABLE in MODES ~~S~~ 3~~, 4, and 5~~ to prevent this potential flow path from lowering the reactor vessel level to the top of the fuel. In MODES 1 and 2, another isolation (i.e., Reactor Steam Dome Pressure—High) and administrative controls ensure that this flow path remains isolated to prevent unexpected loss of inventory via this flow path.

This Function isolates the Group 8 valves.

Traversing In-Core Probe System Isolation

7.a. Reactor Vessel Water Level – Low, Level 1

Low RPV water level indicates that the capability to cool the fuel may be threatened. The valves whose penetrations communicate with the primary containment are isolated to limit the release of fission products. The isolation of the primary containment on Level 1 supports actions to ensure that offsite dose limits of 10 CFR 50.67 are not exceeded. The Reactor Vessel Water Level – Low, Level 1 Function associated with isolation is implicitly assumed in the UFSAR analysis as these leakage paths are assumed to be isolated post-LOCA.

Reactor Vessel Water Level – Low, Level 1 signals are initiated from four level transmitters that sense the difference between the pressure due to a constant column of water (reference leg) and the pressure due to the actual water level (variable leg) in the vessel. Four channels of Reactor Vessel Water Level - Low Level 1 Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function. The isolation function is ensured by the manual shear valve in each penetration.

The Reactor Vessel Water Level - Low Level 1 Allowable Value was chosen to be the same as the RPS Level 1 scram Allowable Value (LCO 3.3.1.1), since isolation of these valves is not critical to orderly plant shutdown. The Allowable Value is referenced from reference level zero. Reference level zero is 367 inches above the vessel zero point.

This Function isolates the Group 2, 6, and 8 valves.

7.b. Drywell Pressure - High

High drywell pressure can indicate a break in the RCPB inside the primary containment. The isolation of some of the primary containment isolation

(continued)

BASES

ACTIONS (continued)

H.1 and H.2

If the channel is not restored to OPERABLE status or placed in trip within the allowed Completion Time, or the Required Action of Condition F or G is not met and the associated Completion Time has expired, the plant must be placed in a MODE or other specified condition in which the LCO does not apply. This is done by placing the plant in at least MODE 3 within 12 hours and in MODE 4 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.

I.1 and I.2

If the channel is not restored to OPERABLE status or placed in trip within the allowed Completion Time, the associated SLC subsystem(s) is declared inoperable or the RWCU System is isolated. Since this Function is required to ensure that the SLC System performs its intended function, sufficient remedial measures are provided by declaring the associated SLC subsystems inoperable or isolating the RWCU System.

The 1 hour Completion Time is acceptable because it minimizes risk while allowing sufficient time for personnel to isolate the RWCU System.

J.1 ~~and J.2~~

If the channel is not restored to OPERABLE status or placed in trip within the allowed Completion Time, the associated penetration flow path should be closed. ~~However, if the shutdown cooling function is needed to provide core cooling, these Required Actions allow the penetration flow path to remain unisolated provided action is immediately initiated to restore the channel to OPERABLE status or to isolate the RHR Shutdown Cooling System (i.e., provide alternate decay heat removal capabilities so the penetration flow path can be isolated).~~ Actions must continue until the channel is restored to OPERABLE status ~~or the RHR Shutdown Cooling System is isolated~~.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

3. Reactor Building Exhaust Radiation—High (continued)

The Reactor Building Exhaust Radiation—High signals are initiated from radiation detectors that are located in the ventilation exhaust ductwork plenum coming from the reactor building. The signal from each detector is input to an individual monitor whose trip outputs are assigned to an isolation channel. Two channels of Reactor Building Exhaust Radiation—High Function are available and are required to be OPERABLE to ensure that no single instrument failure can preclude the isolation function.

The Allowable Values are chosen to promptly detect gross failure of the fuel cladding.

The Reactor Building Exhaust Radiation—High Function is required to be OPERABLE in MODES 1, 2, and 3 where considerable energy exists; thus, there is a probability of pipe breaks resulting in significant releases of radioactive steam and gas. In MODES 4 and 5, the probability and consequences of these events are low due to the RCS pressure and temperature limitations of these MODES; thus, the Function is not required. ~~In addition, the Function is also required to be OPERABLE during OPDRVs and movement of recently irradiated fuel assemblies in the secondary containment, because the capability of detecting radiation releases due to fuel failures (due to fuel uncovery or dropped fuel assemblies) must be provided to ensure that offsite dose limits are not exceeded.~~ Due to radioactive decay, this function is only required to isolate secondary containment during fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours).

ACTIONS

A Note has been provided to modify the ACTIONS related to secondary containment isolation instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Control Building Air Intake Radiation—High Function consists of two independent monitors. Two channels per trip system of Control Building Air Intake Radiation—High are available and are required to be OPERABLE to ensure that no single instrument failure can preclude CREV System initiation. The Allowable Value was selected to ensure protection of the control room personnel.

The Control Building Air Intake Radiation—High Function is required to be OPERABLE in MODES 1, 2, and 3 and during ~~OPDRVs and~~ movement of recently irradiated fuel assemblies in the secondary containment, to ensure that control room personnel are protected during a LOCA, or fuel handling event~~, or vessel draindown event~~. During MODES 4 and 5, ~~when these specified conditions are not in progress (e.g., OPDRVs),~~ the probability of a LOCA, main steam line break accident, or control rod drop accident is low; thus, the Function is not required. Also due to radioactive decay, this Function is only required to initiate the CREV System during fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours).

2. Unit 1 Secondary Containment Isolation—CREV Auto-Start

The Unit 1 Secondary Containment Isolation—CREV Auto-Start Function provides post-LOCA operator protection. Since Reactor Vessel Water Level—Low Level 2 and Drywell Pressure—High provide primary indication of a LOCA, only secondary containment isolations resulting from these signals provide CREV Auto-Start. The Reactor Vessel Water Level—Low Level 2 and the Drywell Pressure—High signals are arranged in such a manner that opening of either A and B, or C and D, relay contacts of either the Reactor Vessel Water Level—Low Level 2 or the Drywell Pressure—High will provide the CREV start signal. Thus, automatic CREV initiation, using signals from the secondary containment isolation logic, provides redundant/diverse protection for control room operators in the event of a LOCA.

The Allowable Values for the Secondary Containment Isolation Instrumentation are provided in Table 3.3.6.2-1.

The Unit 1 Secondary Containment Isolation—CREV Auto-Start Function is required to be OPERABLE in MODES 1,2, and 3 to ensure that control room personnel are protected in the event of a LOCA.

ACTIONS

A Note has been provided to modify the ACTIONS related to CREV System instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions

(continued)

B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

B 3.5.1 ECCS—Operating

BASES

BACKGROUND

The ECCS is designed, in conjunction with the primary and secondary containment, to limit the release of radioactive materials to the environment following a loss of coolant accident (LOCA). The ECCS uses two diverse methods (flooding and spraying) to cool the core during a LOCA. The ECCS consist of the High Pressure Coolant Injection (HPCI) System, the Core Spray (CS) System, the low pressure coolant injection (LPCI) mode of the Residual Heat Removal (RHR) System, and the Automatic Depressurization System (ADS). The suppression pool provides the required source of water for the ECCS. Although no credit is taken in the safety analyses for the condensate storage tank (CST), it is capable of providing a source of water for the HPCI and CS systems.

On receipt of an initiation signal, ECCS pumps automatically start, the systems align, and the pumps inject water, taken either from the CST or suppression pool, into the Reactor Coolant System (RCS) as RCS pressure is overcome by the discharge pressure of the ECCS pumps. Although the system is initiated, ADS action is delayed, allowing the operator to interrupt the timed sequence if the system is not needed. The HPCI pump discharge pressure almost immediately exceeds that of the RCS, and the pump injects coolant into the vessel to cool the core. If the break is small, the HPCI System will maintain coolant inventory as well as vessel level while the RCS is still pressurized. If HPCI fails, it is backed up by ADS in combination with LPCI and CS. In this event, the ADS timed sequence would be allowed to time out and open the selected safety/relief valves (SRVs) depressurizing the RCS, thus allowing the LPCI and CS to overcome RCS pressure and inject coolant into the vessel. If the break is large, RCS pressure drops rapidly and the LPCI and CS Systems inject to cool the core.

Water from the break returns to the suppression pool where it is reused. Water in the suppression pool is circulated through a heat exchanger cooled by the RHR Service Water System. Depending on the location and size of the break, portions of the ECCS may be ineffective; however,

(continued)

BASES

LCO

Each ECCS injection/spray subsystem and six of seven ADS valves are required to be OPERABLE. The ECCS injection/spray subsystems are defined as the two CS subsystems, the two LPCI subsystems, and one HPCI System. The low pressure ECCS injection/spray subsystems are defined as the two CS subsystems and the two LPCI subsystems. Management of gas voids is important to ECCS injection/spray subsystem OPERABILITY.

With less than the required number of ECCS subsystems OPERABLE, the potential exists that during a limiting design basis LOCA concurrent with the worst case single failure, the limits specified in Reference 9 could be exceeded. All ECCS subsystems must therefore be OPERABLE to satisfy the single failure criterion required by Reference 9.

LPCI subsystems may be considered OPERABLE during alignment and operation for decay heat removal when below the actual RHR shutdown cooling isolation pressure in MODE 3, if they are capable of being manually realigned (remote or local) to the LPCI mode and not otherwise inoperable. Alignment and operation for decay heat removal includes the period when the required RHR pump is not operating and the period when the system is being realigned to or from 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.

APPLICABILITY

All ECCS subsystems are required to be OPERABLE during MODES 1, 2, and 3, when there is considerable energy in the reactor core and core cooling would be required to prevent fuel damage in the event of a break in the primary system piping. In MODES 2 and 3, when reactor steam dome pressure is $\leq$ 150 psig, ADS and HPCI are not required to be OPERABLE because the low pressure ECCS subsystems can provide sufficient flow below this pressure. ~~ECCS r~~Requirements for MODES 4 and 5 are specified in LCO 3.5.2, "RPV Water Inventory Control~~ECCS—Shutdown~~."

(continued)

New B 3.5.2. Replaces existing B 3.5.2 in its entirety.

B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), RPV WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

B 3.5.2 Reactor Pressure Vessel (RPV) Water Inventory Control

BASES

BACKGROUND

The RPV contains penetrations below the top of the active fuel (TAF) that have the potential to drain the reactor coolant inventory to below the TAF. If the water level should drop below the TAF, the ability to remove decay heat is reduced, which could lead to elevated cladding temperatures and clad perforation. Safety Limit 2.1.1.3 requires the RPV water level to be above the top of the active irradiated fuel at all times to prevent such elevated cladding temperatures.

APPLICABLE SAFETY ANALYSES

With the unit in MODE 4 or 5, RPV water inventory control is not required to mitigate any events or accidents evaluated in the safety analyses. RPV water inventory control is required in MODES 4 and 5 to protect Safety Limit 2.1.1.3 and the fuel cladding barrier to prevent the release of radioactive material to the environment should an unexpected draining event occur.

A double-ended guillotine break of the Reactor Coolant System (RCS) is not postulated in MODES 4 and 5 due to the reduced RCS pressure, reduced piping stresses, and ductile piping systems. Instead, an event is considered in which single operator error or initiating event allows draining of the RPV water inventory through a single penetration flow path with the highest flow rate, or the sum of the drain rates through multiple penetration flow paths susceptible to a common mode failure (e.g., seismic event, loss of normal power, single human error). It is assumed, based on engineering judgment, that while in MODES 4 and 5, one low pressure ECCS injection/spray subsystem can maintain adequate reactor vessel water level.

As discussed in References 1, 2, 3, 4, and 5, operating experience has shown RPV water inventory to be significant to public health and safety. Therefore, RPV Water Inventory Control satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

LCO

The RPV water level must be controlled in MODES 4 and 5 to ensure that if an unexpected draining event should occur, the reactor coolant water level remains above the top of the active irradiated fuel as required by Safety Limit 2.1.1.3.

(continued)

New B 3.5.2. Replaces existing B 3.5.2 in its entirety.

BASES

LCO (continued)

The Limiting Condition for Operation (LCO) requires the DRAIN TIME of RPV water inventory to the TAF to be ≥ 36 hours. A DRAIN TIME of 36 hours is considered reasonable to identify and initiate action to mitigate unexpected draining of reactor coolant. An event that could cause loss of RPV water inventory and result in the RPV water level reaching the TAF in greater than 36 hours does not represent a significant challenge to Safety Limit 2.1.1.3 and can be managed as part of normal plant operation.

One low pressure ECCS injection/spray subsystem is required to be OPERABLE and capable of being manually started to provide defense-in-depth should an unexpected draining event occur. A low pressure ECCS injection/spray subsystem consists of either one Core Spray (CS) subsystem or one Low Pressure Coolant Injection (LPCI) subsystem. Each CS subsystem consists of one motor driven pump, piping, and valves to transfer water from the suppression pool or condensate storage tank (CST) to the RPV. Each LPCI subsystem consists of one motor driven pump, piping, and valves to transfer water from the suppression pool to the RPV. In MODES 4 and 5, the RHR System cross tie valve is not required to be closed.

The LCO is modified by a Note which allows a required 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 is not otherwise inoperable. Alignment and operation for decay heat removal includes when the required RHR pump is not operating or when the system is realigned from or to the RHR shutdown cooling mode. This allowance is necessary since the RHR System may be required to operate in the shutdown cooling mode to remove decay heat and sensible heat from the reactor. Because of the restrictions on DRAIN TIME, sufficient time will be available following an unexpected draining event to manually align and initiate LPCI subsystem operation to maintain RPV water inventory prior to the RPV water level reaching the TAF.

APPLICABILITY

RPV water inventory control is required in MODES 4 and 5. Requirements on water inventory control in other MODES are contained in LCOs in Section 3.3, Instrumentation, and other LCOs in Section 3.5, ECCS, RCIC, and RPV Water Inventory Control. RPV water inventory control is required to protect Safety Limit 2.1.1.3 which is applicable whenever irradiated fuel is in the reactor vessel.

(continued)

BASES (continued)

ACTIONS

A.1 and B.1

If the required low pressure ECCS injection/spray subsystem is inoperable, it must be restored to OPERABLE status within 4 hours. In this Condition, the LCO controls on DRAIN TIME minimize the possibility that an unexpected draining event could necessitate the use of the ECCS injection/spray subsystem, however the defense-in-depth provided by the ECCS injection/spray subsystem is lost. The 4 hour Completion Time for restoring the required low pressure ECCS injection/spray subsystem to OPERABLE status is based on engineering judgment that considers the LCO controls on DRAIN TIME and the low probability of an unexpected draining event that would result in loss of RPV water inventory.

If the inoperable ECCS injection/spray subsystem is not restored to OPERABLE status within the required Completion Time, action must be initiated immediately to establish a method of water injection capable of operating without offsite electrical power. The method of water injection includes the necessary instrumentation and controls, water sources, and pumps and valves needed to add water to the RPV or refueling cavity should an unexpected draining event occur. The method of water injection may be manually initiated and may consist of one or more systems or subsystems, and must be able to access water inventory capable of maintaining the RPV water level above the TAF for ≥ 36 hours. If recirculation of injected water would occur, it may be credited in determining the necessary water volume.

C.1, C.2, and C.3

With the DRAIN TIME less than 36 hours but greater than or equal to 8 hours, compensatory measures should be taken to ensure the ability to implement mitigating actions should an unexpected draining event occur. Should a draining event lower the reactor coolant level to below the TAF, there is potential for damage to the reactor fuel cladding and release of radioactive material. Additional actions are taken to ensure that radioactive material will be contained, diluted, and processed prior to being released to the environment.

The secondary containment provides a controlled volume in which fission products can be contained, diluted, and processed prior to release to the environment. Required Action C.1 requires verification of the capability to establish the secondary containment boundary in less than the DRAIN TIME. The required verification confirms actions to establish the secondary containment boundary are preplanned and necessary materials are available. The secondary containment boundary is considered established when one Standby Gas Treatment (SGT) subsystem is capable of maintaining a negative pressure in the secondary containment with respect to the environment.

(continued)

BASES

ACTIONS

C.1, C.2, and C.3 (continued)

Verification that the secondary containment boundary can be established must be performed within 4 hours. The required verification is an administrative activity and does not require manipulation or testing of equipment. Secondary containment penetration flow paths form a part of the secondary containment boundary. Required Action C.2 requires verification of the capability to isolate each secondary containment penetration flow path in less than the DRAIN TIME. The required verification confirms actions to isolate the secondary containment penetration flow paths are preplanned and necessary materials are available. Power operated valves are not required to receive automatic isolation signals if they can be closed manually within the required time. Verification that the secondary containment penetration flow paths can be isolated must be performed within 4 hours. The required verification is an administrative activity and does not require manipulation or testing of equipment.

One SGT subsystem is capable of maintaining the secondary containment at a negative pressure with respect to the environment and filter gaseous releases. Required Action C.3 requires verification of the capability to place one SGT subsystem in operation in less than the DRAIN TIME. The required verification confirms actions to place a SGT subsystem in operation are preplanned and necessary materials are available. Verification that a SGT subsystem can be placed in operation must be performed within 4 hours. The required verification is an administrative activity and does not require manipulation or testing of equipment.

D.1, D.2, D.3, and D.4

With the DRAIN TIME less than 36 hours but greater than or equal to 8 hours, compensatory measures should be taken to ensure the ability to implement mitigating actions should an unexpected draining event occur. Should a draining event lower the reactor coolant level to below the TAF, there is potential for damage to the reactor fuel cladding and release of radioactive material. Additional actions are taken to ensure that radioactive material will be contained, diluted, and processed prior to being released to the environment.

With the DRAIN TIME less than 8 hours, mitigating actions are implemented in case an unexpected draining event should occur. Note that if the DRAIN TIME is less than 1 hour, Required Action E.1 is also applicable.

(continued)

New B 3.5.2. Replaces existing B 3.5.2 in its entirety.

BASES

ACTIONS

D.1, D.2, D.3, and D.4 (continued)

Required Action D.1 requires immediate action to establish an additional method of water injection augmenting the ECCS injection/spray subsystem required by the LCO. The additional method of water injection includes the necessary instrumentation and controls, water sources, and pumps and valves needed to add water to the RPV or refueling cavity should an unexpected draining event occur. The Note to Required Action D.1 states that either the ECCS injection/spray subsystem or the additional method of water injection must be capable of operating without offsite electrical power. The additional method of water injection may be manually initiated and may consist of one or more systems or subsystems. The additional method of water injection must be able to access water inventory capable of being injected to maintain the RPV water level above the TAF for ≥ 36 hours. The additional method of water injection and the ECCS injection/spray subsystem may share all or part of the same water sources. If recirculation of injected water would occur, it may be credited in determining the required water volume.

Should a draining event lower the reactor coolant level to below the TAF, there is potential for damage to the reactor fuel cladding and release of radioactive material. Additional actions are taken to ensure that radioactive material will be contained, diluted, and processed prior to being released to the environment.

The secondary containment provides a control volume in which fission products can be contained, diluted, and processed prior to release to the environment. Required Action D.2 requires that actions be immediately initiated to establish the secondary containment boundary. With the secondary containment boundary established, one SGT subsystem is capable of maintaining a negative pressure in the secondary containment with respect to the environment.

The secondary containment penetrations form a part of the secondary containment boundary. Required Action D.3 requires that actions be immediately initiated to verify that each secondary containment penetration flow path is isolated or to verify that it can be manually isolated from the control room.

One SGT subsystem is capable of maintaining the secondary containment at a negative pressure with respect to the environment and filter gaseous releases. Required Action D.4 requires that actions be immediately initiated to verify that at least one SGT subsystem is capable of being placed in operation. The required verification is an administrative activity and does not require manipulation or testing of equipment.

(continued)

BASES

ACTIONS (continued)

E.1

If the Required Actions and associated Completion times of Conditions C or D are not met or if the DRAIN TIME is less than 1 hour, actions must be initiated immediately to restore the DRAIN TIME to ≥ 36 hours. In this condition, there may be insufficient time to respond to an unexpected draining event to prevent the RPV water inventory from reaching the TAF. Note that Required Actions D.1, D.2, D.3, and D.4 are also applicable when DRAIN TIME is less than 1 hour.

SURVEILLANCE REQUIREMENTS

SR 3.5.2.1

This Surveillance verifies that the DRAIN TIME of RPV water inventory to the TAF is ≥ 36 hours. The period of 36 hours is considered reasonable to identify and initiate action to mitigate draining of reactor coolant. Loss of RPV water inventory that would result in the RPV water level reaching the TAF in greater than 36 hours does not represent a significant challenge to Safety Limit 2.1.1.3 and can be managed as part of normal plant operation.

The definition of DRAIN TIME states that realistic cross-sectional areas and drain rates are used in the calculation. A realistic drain rate may be determined using a single, step-wise, or integrated calculation considering the changing RPV water level during a draining event. For a Control Rod RPV penetration flow path with the Control Rod Drive Mechanism removed and not replaced with a blank flange, the realistic cross-sectional area is based on the control rod blade seated in the control rod guide tube. If the control rod blade will be raised from the penetration to adjust or verify seating of the blade, the exposed cross-sectional area of the RPV penetration flow path is used.

The definition of DRAIN TIME excludes from the calculation those penetration flow paths connected to an intact closed system, or isolated by manual or automatic valves that are locked, sealed, or otherwise secured in the closed position, blank flanges, or other devices that prevent flow of reactor coolant through the penetration flow paths. A blank flange or other bolted device must be connected with a sufficient number of bolts to prevent draining in the event of an Operating Basis Earthquake. Normal or expected leakage from closed systems or past isolation devices is permitted. Determination that a system is intact and closed or isolated must consider the status of branch lines and ongoing plant maintenance and testing activities.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.5.2.1 (continued)

The Residual Heat Removal (RHR) Shutdown Cooling System is only considered an intact closed system when misalignment issues (Ref. 6) have been precluded by functional valve interlocks or by isolation devices, such that redirection of RPV water out of an RHR subsystem is precluded. Further, RHR Shutdown Cooling System is only considered an intact closed system if its controls have not been transferred to Remote Shutdown, which disables the interlocks and isolation signals.

The exclusion of penetration flow paths from the determination of DRAIN TIME must consider the potential effects of a single operator error or initiating event on items supporting maintenance and testing (rigging, scaffolding, temporary shielding, piping plugs, snubber removal, freeze seals, etc.). If failure of such items could result and would cause a draining event from a closed system or between the RPV and the isolation device, the penetration flow path may not be excluded from the DRAIN TIME calculation.

Surveillance Requirement 3.0.1 requires SRs to be met between performances. Therefore, any changes in plant conditions that would change the DRAIN TIME requires that a new DRAIN TIME be determined.

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

SR 3.5.2.2 and SR 3.5.2.3

The minimum water level of -31 inches required for the suppression pool is periodically verified to ensure that the suppression pool will provide adequate net positive suction head (NPSH) for the CS subsystem or LPCI subsystem pump, recirculation volume, and vortex prevention. With the suppression pool water level less than the required limit, the required ECCS injection/spray subsystem is inoperable unless aligned to an OPERABLE CST.

The required CS System is OPERABLE only if it can take suction from the CST and the CST contains a total volume, which includes both usable and unusable volumes, of $\geq$ 228,200 gallons of water, ensures that the CS System can supply at least 50,000 gallons of makeup water to the RPV. CS System air ingestion is expected to occur at the level which corresponds to a CST volume of 178,200 gallons.

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

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.4

The flow path piping has the potential to develop voids and pockets of entrained air. Maintaining the pump discharge lines of the required ECCS injection/spray subsystems full of water ensures that the ECCS subsystem will perform properly. This may also prevent a water hammer following an ECCS initiation signal. One acceptable method of ensuring that the lines are full is to vent at the high points. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.5

Verifying the correct alignment for manual, power operated, and automatic valves in the required ECCS subsystem flow path provides assurance that the proper flow paths will be available 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 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.

SR 3.5.2.6

Verifying that the required ECCS injection/spray subsystem can be manually started and operate for at least 10 minutes demonstrates that the subsystem is available to mitigate a draining event. Testing the ECCS injection/spray subsystem through the recirculation line is necessary to avoid overfilling the refueling cavity. The minimum operating time of 10 minutes was based on engineering judgment. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.7

Verifying that each valve credited for automatically isolating a penetration flow path actuates to the isolation position on an actual or simulated RPV water level isolation signal is required to prevent RPV water inventory from dropping below the TAF should an unexpected draining event occur.

(continued)

New B 3.5.2. Replaces existing B 3.5.2 in its entirety.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.8

The required ECCS subsystem shall be capable of being manually operated. This Surveillance verifies that the required CS or LPCI subsystem (including the associated pump and valve(s)) can be manually operated to provide additional RPV Water Inventory, if needed.

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

REFERENCES

1. Information Notice 84-81 "Inadvertent Reduction in Primary Coolant Inventory in Boiling Water Reactors During Shutdown and Startup," November 1984.
2. Information Notice 86-74, "Reduction of Reactor Coolant Inventory Because of Misalignment of RHR Valves," August 1986.
3. Generic Letter 92-04, "Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation in BWRs Pursuant to 10 CFR 50.54(f), " August 1992.
4. NRC Bulletin 93-03, "Resolution of Issues Related to Reactor Vessel Water Level Instrumentation in BWRs," May 1993.
5. Information Notice 94-52, "Inadvertent Containment Spray and Reactor Vessel Draindown at Millstone 1," July 1994.
6. General Electric Service Information Letter No. 388, "RHR Valve Misalignment During Shutdown Cooling Operation for BWR 3/4/5/6," February 1983.

B 3.3 INSTRUMENTATION

B 3.3.5.3 Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

BASES

BACKGROUND

The RPV contains penetrations below the top of the active fuel (TAF) that have the potential to drain the reactor coolant inventory to below the TAF. If the water level should drop below the TAF, the ability to remove decay heat is reduced, which could lead to elevated cladding temperatures and clad perforation. Safety Limit 2.1.1.3 requires the RPV water level to be above the top of the active irradiated fuel at all times to prevent such elevated cladding temperatures.

Technical Specifications are required by 10 CFR 50.36 to include limiting safety system settings (LSSS) for variables that have significant safety functions. LSSS are defined by the regulation as "Where a LSSS is specified for a variable on which a safety limit has been placed, the setting must be chosen so that automatic protective actions will correct the abnormal situation before a Safety Limit (SL) is exceeded." The Analytical Limit is the limit of the process variable at which a safety action is initiated to ensure that a SL is not exceeded. Any automatic protection action that occurs on reaching the Analytical Limit therefore ensures that the SL is not exceeded. However, in practice, the actual settings for automatic protection channels must be chosen to be more conservative than the Analytical Limit to account for instrument loop uncertainties related to the setting at which the automatic protective action would actually occur. The actual settings for the automatic isolation channels are the same as those established for the same functions in MODES 1, 2, and 3 in LCO 3.3.5.1, "Emergency Core Cooling System (ECCS) Instrumentation," or LCO 3.3.6.1, "Primary Containment Isolation instrumentation".

With the unit in MODE 4 or 5, RPV water inventory control is not required to mitigate any events or accidents evaluated in the safety analyses. RPV water inventory control is required in MODES 4 and 5 to protect Safety Limit 2.1.1.3 and the fuel cladding barrier to prevent the release of radioactive material should a draining event occur. Under the definition of DRAIN TIME, some penetration flow paths may be excluded from the DRAIN TIME calculation if they will be isolated by valves that will close automatically without offsite power prior to the RPV water level being equal to the TAF when actuated by RPV water level isolation instrumentation.

(continued)

BASES

BACKGROUND (continued)	The RCIC pump is provided with a minimum flow bypass line, which discharges to the suppression pool. The valve in this line automatically opens to prevent pump damage due to overheating when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge piping is maintained full of water using a "keep fill" system.
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 10 CFR 50.36(c)(2)(ii) (Ref. 3) and is therefore included in the Technical Specifications.
LCO	The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the low pressure ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity for maintaining RPV inventory during an isolation event. Management of gas voids is important to RCIC OPERABILITY.
APPLICABILITY	The RCIC System is required to be OPERABLE during 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, the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV. ~~and i~~In MODES 4 and 5, RCIC is not required to be OPERABLE since RPV water inventory control is required by LCO 3.5.2, "RPV Water Level Inventory Control."~~the low pressure ECCS injection/spray subsystems can provide sufficient flow to the RPV.~~
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 MODE 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCI System is verified immediately to be OPERABLE, the RCIC System must be restored to

(continued)

BASES (continued)

APPLICABILITY

In MODES 1, 2, and 3, a DBA could cause a release of radioactive material to primary containment. In MODES 4 and 5, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, ~~most~~ PCIVs are not required to be OPERABLE in MODES 4 and 5. Certain valves, however, are required to be OPERABLE when the ~~to prevent inadvertent reactor vessel draindown. These valves are those whose~~ associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation." (This does not include the valves that isolate the associated instrumentation.)

ACTIONS

The ACTIONS are modified by a Note allowing penetration flow path(s) to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator at the controls of the valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for primary containment isolation is indicated.

A second Note has been added to provide clarification that, for the purpose of this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable PCIV. Complying with the Required Actions may allow for continued operation, and subsequent inoperable PCIVs are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are modified by Notes 3 and 4. Note 3 ensures that appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable PCIV (e.g., an Emergency Core Cooling System subsystem is inoperable due to a failed open test return valve). Note 4 ensures appropriate remedial actions are taken when the primary containment leakage limits are exceeded. Pursuant to LCO 3.0.6, these actions are not required even when the associated LCO is not met. Therefore, Notes 3 and 4 are added to require the proper actions be taken.

(continued)

BASES

ACTIONS (continued)

D.1

With one or more penetration flow paths with MSIV leakage rate not within limit, the assumptions of the safety analysis may not be met. Therefore, the leakage must be restored to within limit within 8 hours. Restoration can be accomplished by isolating the penetration that caused the limit to be exceeded by use of one closed and de-activated automatic valve, closed manual valve, or blind flange. When a penetration is isolated, the leakage rate for the isolated penetration is assumed to be the actual pathway leakage through the isolation device. If two isolation devices are used to isolate the penetration, the leakage rate is assumed to be the lesser actual pathway leakage of the two devices. The 8 hour Completion Time allows a period of time to restore the leakage to within limits given the fact that MSIV closure will result in isolation of the main steam line(s) and a potential for plant shutdown.

E.1 and E.2

If any Required Action and associated Completion Time cannot be met in MODE 1, 2, or 3, the plant must be brought to a MODE 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 to MODE 4 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.

F.1 ~~and F.2~~

If any Required Action and associated Completion Time cannot be met for PCIV(s) required to be OPERABLE in MODE 4 or 5, the unit must be placed in a condition in which the LCO does not apply. Action must be immediately initiated to ~~suspend operations with a potential for draining the reactor vessel (OPDRVs) to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until OPDRVs are suspended and valve(s) are restored to OPERABLE status. If suspending an OPDRV would result in closing the residual heat removal (RHR) shutdown cooling isolation valves, an alternative Required Action is provided to immediately initiate action to~~

(continued)

BASES

ACTIONS

F.1 ~~and F.2~~ (continued)

restore the valve(s) to OPERABLE status. This allows RHR shutdown cooling to remain in service while actions are being taken to restore the valve.

SURVEILLANCE REQUIREMENTS

SR 3.6.1.3.1

This SR verifies that each primary containment isolation manual valve and blind flange that is located outside primary containment and not locked, sealed, or otherwise secured and is required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the primary containment boundary is within design limits.

This SR does not require any testing or valve manipulation. Rather, it involves verification that those devices outside primary containment, and capable of being mispositioned, are in the correct position. Since verification of valve position for devices outside primary containment is relatively easy, the 31 day Frequency was chosen to provide added assurance that the devices are in the correct positions.

Two Notes have been added to this SR. The first Note allows valves and blind flanges located in high radiation areas to be verified by use of administrative controls. Allowing verification by administrative controls is considered acceptable since the primary containment is inerted and access to these areas is typically restricted during MODES 1, 2, and 3 for ALARA reasons. Therefore, the probability of misalignment of these devices, once they have been verified to be in the proper position, is low. A second Note has been included to clarify that PCIVs that are open under administrative controls are not required to meet the SR during the time that the PCIVs are open. These controls consist of stationing a dedicated operator at the controls of the valve, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for primary containment isolation is indicated. This SR does not apply to valves and blind flanges that are locked, sealed, or otherwise secured in the correct position, since these devices were verified to be in the correct position upon locking, sealing, or securing.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

Initial suppression pool water level affects suppression pool temperature response calculations, calculated drywell pressure during vent clearing for a DBA, calculated pool swell loads for a DBA LOCA, and calculated loads due to SRV discharges. Suppression pool water level must be maintained within the limits specified so that the safety analysis of References 1 and 2 remains valid.

Suppression pool water level satisfies Criteria 2 and 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 3).

LCO

A limit that suppression pool water level be $\geq$ -31 inches and $\leq$ -27 inches is required to ensure that the primary containment conditions assumed for the safety analyses are met. Either the high or low water level limits were used in the safety analyses, depending upon which is more conservative for a particular calculation.

APPLICABILITY

In MODES 1, 2, and 3, a DBA would cause significant loads on the 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. The requirements for maintaining suppression pool water level within limits in MODE 4 or 5 is addressed in LCO 3.5.2, "RPV Water Inventory Control~~ECCS Shutdown~~."

ACTIONS

A.1

With suppression pool water level outside the limits, the conditions assumed for the safety analyses are not met. If water level is below the minimum level, the pressure suppression function still exists as long as main vents are covered, HPCI and RCIC turbine exhausts are covered, and SRV quenchers are covered. If suppression pool water level is above the maximum level, protection against overpressurization still exists due to the margin in the peak containment pressure analysis and the capability of the Drywell Spray System. Therefore, continued operation for a limited time is allowed. The 2 hour Completion Time is sufficient to restore suppression pool water level to within limits. Also, it takes into account the low probability of an event impacting the suppression pool water level occurring during this interval.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Secondary containment satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 4).
LCO	An OPERABLE secondary containment provides a control volume into which fission products that leak from primary containment, or are released from the reactor coolant pressure boundary components or irradiated fuel assemblies located in secondary containment, can be processed prior to release to the environment. For the secondary containment to be considered OPERABLE, it must have adequate leak tightness to ensure that the required vacuum can be established and maintained.
APPLICABILITY	In MODES 1, 2, and 3, a LOCA could lead to a fission product release to primary containment that leaks to secondary containment. Therefore, secondary containment OPERABILITY is required during the same operating conditions that require primary containment OPERABILITY. In MODES 4 and 5, the probability and consequences of the LOCA are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining secondary containment OPERABLE is not required in MODE 4 or 5 to ensure a control volume, except for other situations for which significant releases of radioactive material can be postulated, such as during ~~operations with a potential for draining the reactor vessel (OPDRVs) or during~~ movement of recently irradiated fuel assemblies in the secondary containment. Due to radioactive decay, secondary containment is only required to be OPERABLE during fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours).
ACTIONS	A.1 If secondary containment is inoperable, it must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time provides a period of time to correct the problem that is commensurate with the importance of maintaining secondary containment during MODES 1, 2, (continued)

BASES

ACTIONS

A.1 (continued)

and 3. This time period also ensures that the probability of an accident (requiring secondary containment OPERABILITY) occurring during periods where secondary containment is inoperable is minimal.

B.1 and B.2

If secondary containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE 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 to MODE 4 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.

C.1 ~~and C.2~~

Movement of recently irradiated fuel assemblies in the secondary containment ~~and OPDRVs~~ can be postulated to cause significant fission product release to the secondary containment. In such cases, the secondary containment is the only barrier to release of fission products to the environment. Therefore, movement of recently irradiated fuel assemblies must be immediately suspended if the secondary containment is inoperable. Suspension of this activity shall not preclude completing an action that involves moving a component to a safe position. ~~Also, action must be immediately initiated to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since recently irradiated fuel assembly movement can occur in MODE 1, 2, or 3, Required Action C.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	Maintaining SCIDs OPERABLE with isolation times within limits ensures that fission products will remain trapped inside secondary containment so that they can be treated by the SGT System prior to discharge to the environment. SCIDs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 4).
LCO	SCIDs form a part of the secondary containment boundary. The SCID safety function is related to control of offsite radiation releases resulting from DBAs. The isolation dampers are considered OPERABLE when their associated accumulators are pressurized, their isolation times are within limits, and the dampers are capable of actuating on an automatic isolation signal. The dampers covered by this LCO, along with their associated stroke times, are listed in Reference 5.
APPLICABILITY	In MODES 1, 2, and 3, a DBA could lead to a fission product release to the primary containment that leaks to the secondary containment. Therefore, the OPERABILITY of SCIDs is required. In MODES 4 and 5, the probability and consequences of these events are reduced due to pressure and temperature limitations in these MODES. Therefore, maintaining SCIDs OPERABLE is not required in MODE 4 or 5, except for other situations under which significant radioactive releases can be postulated, such as ~~during operations with a potential for draining the reactor vessel (OPDRVs) or~~ during movement of recently irradiated fuel assemblies in the secondary containment. Moving recently irradiated fuel assemblies in the secondary containment may also occur in MODES 1, 2, and 3. Due to radioactive decay, SCIDs are only required to be OPERABLE during fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours).
ACTIONS	The ACTIONS are modified by three Notes. The first Note allows penetration flow paths to be unisolated intermittently under administrative controls. These controls consist of stationing a dedicated operator, who

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1 ~~and D.2~~

If any Required Action and associated Completion Time are not met, the plant must be placed in a condition in which the LCO does not apply. If applicable, the movement of recently irradiated fuel assemblies in the secondary containment must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. ~~Also, if applicable, actions must be immediately initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since recently irradiated fuel assembly movement can occur in MODE 1, 2, or 3, Required Action D.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE REQUIREMENTS

SR 3.6.4.2.1

Verifying that the isolation time of each automatic SCID is within limits, by cycling each SCID through one complete cycle of full travel and measuring the isolation time, is required to demonstrate OPERABILITY. The isolation time test ensures that the SCID will isolate in the required time period. The Frequency of this SR is once per 24 months. Operating experience has demonstrated these components will usually pass the Surveillance when performed at the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

(continued)

BASES

BACKGROUND (continued)

the charcoal from fouling. The charcoal adsorber beds remove gaseous elemental iodine and organic iodides, and the final HEPA filter collects any carbon fines exhausted from the charcoal adsorber.

The SGT System automatically starts and operates in response to actuation signals indicative of conditions or an accident that could require operation of the system. Following an initiation signal, both SGT charcoal filter train fans start.

APPLICABLE SAFETY ANALYSES

The design basis for the SGT System is to mitigate the consequences of a loss of coolant accident and fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours) (Refs. 2 and 3). For all events analyzed, the SGT System is shown to be automatically initiated to reduce, via filtration and adsorption, the radioactive material released to the environment.

The SGT System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 5).

LCO

Following a DBA, a minimum of one SGT subsystem is required to maintain the secondary containment at a negative pressure with respect to the environment and to process gaseous releases. Meeting the LCO requirements for two OPERABLE subsystems ensures operation of at least one SGT subsystem in the event of a single active failure.

APPLICABILITY

In MODES 1, 2, and 3, a DBA could lead to a fission product release to primary containment that leaks to secondary containment. Therefore, SGT System OPERABILITY is required during these MODES.

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 the SGT System in OPERABLE status is not required in MODE 4 or 5, except for other situations under which significant releases of radioactive material can be postulated, such as ~~during operations with a potential for draining the reactor vessel~~

(continued)

BASES

APPLICABILITY (continued)

~~(OPDRVs) or~~ during movement of recently irradiated fuel assemblies in the secondary containment. Due to radioactive decay, the SGT System is only required to be OPERABLE during fuel handling accidents involving handling recently irradiated fuel (i.e., fuel that has occupied part of a critical reactor core within the previous 24 hours).

ACTIONS

A.1

With one SGT subsystem inoperable in MODE 1, 2, or 3, the inoperable subsystem must be restored to OPERABLE status in 7 days. In this condition, the remaining OPERABLE SGT subsystem is adequate to perform the required radioactivity release control function. However, the overall system reliability is reduced because a single failure in the OPERABLE subsystem could result in the radioactivity release control function not being adequately performed. The 7 day Completion Time is based on consideration of such factors as the availability of the OPERABLE redundant SGT subsystem and the low probability of a DBA occurring during this period.

B.1 and B.2

In MODE 1, 2, or 3, if one SGT subsystem cannot be restored to OPERABLE status within the required Completion Time or both SGT subsystems are inoperable, the plant must be brought to a MODE 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 to MODE 4 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.

C.1

With one SGT subsystem inoperable during movement of recently irradiated fuel assemblies in secondary containment or during OPDRVs, the inoperable subsystem must be restored to OPERABLE status in 31 days. In this condition, the remaining OPERABLE SGT subsystem is adequate to perform the required radioactivity release control function. However, the overall system reliability is reduced because a single

(continued)

BASES

ACTIONS

C.1 (continued)

failure in the OPERABLE subsystem could result in the radioactivity release control function not being adequately performed. The 31 day Completion Time is based on consideration of such factors as the availability of the OPERABLE redundant SGT subsystem and the probability and consequences of an event requiring the radioactivity release control function during this period.

D.1~~, D.2.1,~~ and D.2~~.2~~

During movement of recently irradiated fuel assemblies, in the secondary containment ~~or during OPDRVs~~, when Required Action C.1 cannot be completed within the required Completion Time, the OPERABLE SGT subsystem should immediately be placed in operation. This action ensures that the remaining subsystem is OPERABLE, that no failures that could prevent automatic actuation have occurred, and that any other failure would be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that represent a potential for releasing a significant amount of radioactive material to the secondary containment, thus placing the plant in a condition that minimizes risk. If applicable, movement of recently irradiated fuel assemblies must immediately be suspended. Suspension of these activities must not preclude completion of movement of a component to a safe position. ~~Also, if applicable, actions must immediately be initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.~~

LCO 3.0.3 is not applicable in MODE 4 or 5. However, since recently irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the Required Actions of Condition D have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel

(continued)

BASES

ACTIONS

D.1~~, D.2.1,~~ and D.2~~.2~~ (continued)

assemblies would not be a sufficient reason to require a reactor shutdown.

E.1~~ and E.2~~

When two SGT subsystems are inoperable, if applicable, movement of recently irradiated fuel assemblies in secondary containment must immediately be suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position. ~~Also, if applicable, actions must immediately be initiated to suspend OPDRVs in order to minimize the probability of a vessel draindown and subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since recently irradiated fuel assembly movement can occur in MODE 1, 2, or 3, Required Action E.1 has been modified by a Note stating that LCO 3.0.3 is not applicable. If moving recently irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving recently irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of recently irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown.

SURVEILLANCE REQUIREMENTS

SR 3.6.4.3.1

Operating each SGT subsystem, by initiating (from the control room) flow through the HEPA filters and charcoal adsorbers, for ≥ 10 continuous hours ensures that both subsystems are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. Operation with the heaters on automatic control for ≥ 10 continuous hours every 31 days eliminates moisture on the adsorbers and HEPA filters. The 31 day Frequency was developed in consideration of the known reliability of fan motors and controls and the redundancy available in the system.

(continued)

BASES

LCO (continued)

c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

Also, two control room supply fans must be OPERABLE to ensure single failure criteria can be met.

In order for the CREV subsystems to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for DBAs, and that CRE occupants are protected from hazardous chemicals and smoke.

The LCO is modified by a Note allowing the CRE boundary to be opened intermittently under administrative controls. This Note only applies to openings in the CRE boundary that can be rapidly restored to the design condition, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be proceduralized and consist of stationing a dedicated individual at the opening who is in continuous communication with the operators in the CRE. This individual will have a method to rapidly close the opening and to restore the CRE boundary to a condition equivalent to the design condition when a need for CRE isolation is indicated.

APPLICABILITY

In MODES 1, 2, and 3, the CREV System must be OPERABLE to control operator exposure during and following a DBA, since the DBA could lead to a fission product release.

In MODES 4 and 5, the probability and consequences of a DBA are reduced because of the pressure and temperature limitations in these MODES. Therefore, maintaining the CREV System OPERABLE is not required in MODE 4 or 5, except ~~for the following situations under which significant radioactive releases can be postulated~~:

a. ~~D~~during movement of irradiated fuel assemblies in the secondary containment; and

b. ~~D~~during CORE ALTERATIONS.~~; and~~

~~c. During operations with a potential for draining the reactor vessel (OPDRVs).~~

(continued)

BASES

ACTIONS (continued)

C.1 and C.2

In MODE 1, 2, or 3, if any Required Action and required Completion Time of Condition A or B cannot be met or two CREV subsystems are inoperable for reasons other than Condition B, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, and D.2.2~~, and D.2.3~~

The Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment~~,~~ or during CORE ALTERATIONS~~, or during OPDRVs~~, if the inoperable CREV subsystem cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE CREV subsystem may be placed in the radiation/smoke protection mode. This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent automatic actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the CRE. This places the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position.~~ Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.~~

(continued)

BASES (continued)

ACTIONS (continued)

E.1~~,~~ and E.2~~, and E.3~~

The Required Actions of Condition E are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment~~,~~ or during CORE ALTERATIONS, ~~or during OPDRVs,~~ with two CREV subsystems inoperable or with one or more CREV subsystems inoperable due to an inoperable CRE boundary, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the CRE. These actions place the unit in a condition that minimizes the accident risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. ~~Also, if applicable, actions must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until the OPDRVs are suspended.~~

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that each CREV subsystem in a standby mode starts on demand and continues to operate. This SR includes initiating flow through the associated HEPA filter and charcoal adsorber bank. Standby systems should be checked periodically to ensure that they start and function properly. As the environmental and normal operating conditions of this system are not severe, testing each subsystem once every 31 days provides an adequate check on this system. Since the CREV subsystems do not have installed heaters, each subsystem need only be operated for $\geq$ 15 minutes to demonstrate the function of the subsystem. The 31 day Frequency is based on the known reliability of the equipment and the two subsystem redundancy available.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Redundant detectors and controls are provided for control room temperature control. The Control Room AC System is designed in accordance with Seismic Category I requirements. The Control Room AC System is capable of removing sensible and latent heat loads from the control room, including consideration of equipment heat loads and personnel occupancy requirements to ensure equipment OPERABILITY.

The Control Room AC System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 2).

LCO

Three redundant subsystems of the Control Room AC System are required to be OPERABLE to ensure that at least two subsystems are available, assuming a single failure disables one subsystem. A failure of two or more control room AC subsystems could result in the equipment operating temperature exceeding limits.

The Control Room AC System is considered OPERABLE when the individual components necessary to maintain the control room temperature are OPERABLE in all three subsystems. These components include the cooling coils, supply fans, compressor-condenser units, ductwork, dampers, and associated instrumentation and controls.

APPLICABILITY

In MODE 1, 2, or 3, the Control Room AC System must be OPERABLE to ensure that the control room temperature will not exceed equipment OPERABILITY limits following control room isolation.

In MODES 4 and 5, the probability and consequences of a Design Basis Accident are reduced due to the pressure and temperature limitations in these MODES. Therefore, maintaining the Control Room AC System OPERABLE is not required in MODE 4 or 5, except ~~for the following situations under which significant radioactive releases can be postulated~~:

a. During movement of irradiated fuel assemblies in the secondary containment; and

b. During CORE ALTERATIONS.~~; and~~

~~c. During operations with a potential for draining the reactor vessel (OPDRVs).~~

(continued)

BASES

ACTIONS (continued)

D.1, D.2.1, and D.2.2~~, and D.2.3~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the Required Actions of Condition D are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment~~,~~ or during CORE ALTERATIONS, ~~or during OPDRVs,~~ if Required Action A.1 or B.1 cannot be completed within the associated Completion Time, the OPERABLE control room AC subsystem or subsystems may be placed immediately in operation. This action ensures that the remaining subsystem(s) is OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. ~~Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until the OPDRVs are suspended.~~

E.1

If three control room AC subsystems are inoperable in MODE 1, 2, or 3, the Control Room AC System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.

(continued)

BASES

ACTIONS (continued)

F.1, and F.2~~, and F.3~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the Required Actions of Condition F are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not a sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment~~,~~ or during CORE ALTERATIONS,~~ or during OPDRVs,~~ with three control room AC subsystems inoperable, action must be taken immediately to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and handling of irradiated fuel in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position.~~ Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until the OPDRVs are suspended.~~

SURVEILLANCE REQUIREMENTS

SR 3.7.4.1

This SR verifies that the heat removal capability of the system is sufficient to remove the control room heat load assumed in the safety analyses. The SR consists of a combination of testing and calculation. The 24 month Frequency is appropriate since significant degradation of the Control Room AC System is not expected over this time period.

REFERENCES

1. UFSAR, Section 6.4.2.
2. 10 CFR 50.36(c)(2)(ii).

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.2 AC Sources—Shutdown

BASES

BACKGROUND

A description of the AC sources is provided in the Bases for LCO 3.8.1, "AC Sources—Operating."

APPLICABLE SAFETY ANALYSES

The OPERABILITY of the minimum AC sources during MODES 4 and 5, and during movement of irradiated fuel assemblies in the secondary containment ensures that:

a. The facility can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate AC electrical power is provided to mitigate events postulated during shutdown, such as ~~an inadvertent draindown of the vessel or~~ a fuel handling accident.

In general, when the unit is shutdown the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, and 3 have no specific analyses in MODES 4 and 5. Worst case bounding events are deemed not credible in MODES 4 and 5 because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and corresponding stresses result in the probabilities of occurrences significantly reduced or eliminated, and minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

During MODES 1, 2, and 3, various deviations from the analysis assumptions and design requirements are allowed within the ACTIONS. This allowance is in recognition that certain testing and maintenance activities must be conducted, provided an acceptable level of risk is not

(continued)

BASES

LCO (continued)

transmission network and the onsite Class 1E AC electrical power distribution subsystem(s), needed to support the Unit 2 equipment required to be OPERABLE, must also be OPERABLE. Together, OPERABILITY of the required offsite circuit(s) and DGs ensures the availability of sufficient AC sources to operate the plant in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents ~~and reactor vessel draindown~~).

The qualified offsite circuit(s) must be capable of maintaining rated frequency and voltage while connected to the respective emergency bus(es), and of accepting required loads during an accident. Qualified offsite circuits are those that are described in the UFSAR and are part of the licensing basis for the unit. The Unit 1 qualified offsite circuit consists of the incoming breaker and disconnect to and including the associated startup auxiliary transformer (SAT) or unit auxiliary transformer (UAT), the respective circuit path to and including the balance of plant bus(es), and the circuit path to associated 4.16 kV emergency bus(es) required by LCO 3.8.8. The Unit 2 qualified offsite circuit consists of the incoming breaker and disconnect to and including the associated SAT or UAT, the respective circuit path to and including the balance of plant bus(es), and the circuit path to associated 4.16 kV emergency bus(es) required by LCO 3.7.3, LCO 3.7.4 and LCO 3.8.5.

The required DGs must be capable of starting, accelerating to minimum acceptable frequency and voltage, and connecting to its respective 4.16 kV emergency bus on detection of bus undervoltage. This sequence must be accomplished within 10.5 seconds. Each required DG is required to have an OPERABLE air start system. Additionally, each DG must be capable of accepting required loads within the assumed loading sequence intervals, and must continue to operate until offsite power can be restored to the 4.16 kV emergency buses. These capabilities are required to be met from a variety of initial conditions such as DG in standby with engine at ambient conditions. Additional DG capabilities must be demonstrated to meet required Surveillances, e.g., capability of the DG to revert to standby status on an ECCS signal while operating in parallel test mode. Proper sequencing of loads, including tripping of

(continued)

BASES

LCO (continued)

nonessential loads, is required function for DG OPERABILITY. The necessary portions of the Nuclear Service Water System are also required to provide appropriate cooling to each required DG.

It is acceptable for 4.16 kV emergency buses to be cross tied during shutdown conditions, permitting a single offsite power circuit to supply all required buses provided both units are shutdown.

APPLICABILITY

The AC sources are required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment to provide assurance that:

a. Systems that provide core cooling;~~providing adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel;~~

b. Systems needed to mitigate a fuel handling accident are available;

c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

AC power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.1.

ACTIONS

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in Mode 1, 2, or 3, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, or 3, would require the unit to be shutdown, but would not require immediate suspension of movement of irradiated fuel assemblies. The Note to the ACTIONS "LCO 3.0.3 is not applicable," ensures that the actions for

(continued)

BASES

ACTIONS (continued)

immediate suspension of irradiated fuel assembly movement are not postponed due to entry into LCO 3.0.3.

A.1 and B.1

With one or more required offsite circuits inoperable, or with one DG inoperable, the remaining required AC sources may be capable of supporting sufficient required features (e.g., system, subsystem, division, component, or device) to allow continuation of CORE ALTERATIONS~~,~~ and fuel movement~~, and operations with a potential for draining the reactor vessel~~. For example, if two 4.16 kV emergency buses are required per LCO 3.8.8, one emergency bus with offsite power available may be capable of supplying sufficient required features. By the allowance of the option to declare required features inoperable that are not powered from offsite power (Required Action A.1) or capable of being powered by the required DG (Required Action B.1), appropriate restrictions can be implemented in accordance with the affected required feature(s) LCOs' ACTIONS. Required features remaining powered from the qualified offsite power circuit, even if the circuit is inoperable to other required features, are not declared inoperable by this Required Action.

A.2.1, A.2.2, A.2.3, ~~A.2.4~~, B.2.1, B.2.2, B.2.3, ~~B.2.4~~, C.1, C.2, and C.3~~, and C.4~~

With an offsite circuit not available to all required 4.16 kV emergency buses or one required DG inoperable, the option still exists to declare all required features inoperable (per Required Actions A.1 and B.1). Since this option may involve undesired administrative efforts, the allowance for sufficiently conservative actions is made. With two required DGs inoperable, the minimum required diversity of AC power sources is not available. It is, therefore, required to suspend CORE ALTERATIONS and ~~,~~ movement of irradiated fuel assemblies in the secondary containment~~, and activities that could result in inadvertent draining of the reactor vessel~~.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to

(continued)

BASES

ACTIONS

A.2.1, A.2.2, A.2.3, ~~A.2.4,~~ B.2.1, B.2.2, B.2.3, ~~B.2.4,~~ C.1, C.2, and C.3~~, and C.4~~ (continued)

continue this action until restoration is accomplished in order to provide the necessary AC power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System ACTIONS would not be entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A have been modified by a Note to indicate that when Condition A is entered with no AC power to any required 4.16 kV emergency bus, ACTIONS for LCO 3.8.8 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit whether or not a required bus is de-energized. LCO 3.8.8 provides the appropriate restrictions for the situation involving a de-energized bus.

SURVEILLANCE REQUIREMENTS

SR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the required AC sources in other than MODES 1, 2, and 3 to be met. SR 3.8.1.8 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.12 is not required to be met because the required OPERABLE DG(s) is not required to undergo periods of being synchronized to the offsite circuit. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during the performance of SRs, and to preclude de-energizing a required 4.16 kV emergency bus

(continued)

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.5 DC Sources—Shutdown

BASES

BACKGROUND

A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources—Operating."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume that Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators (DGs), emergency auxiliaries, and control and switching during all MODES of operation and during movement of irradiated fuel assemblies in the secondary containment.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment ensures that:

a. The facility can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as ~~an inadvertent draindown of the vessel or~~ a fuel handling accident.

In general, when the unit is shutdown, the Technical Specification requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis

(continued)

BASES

LCO (continued)

a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents ~~and inadvertent reactor vessel draindown~~).

APPLICABILITY

The DC electrical power sources required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment provide assurance that:

a. Required features to provide core cooling~~adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core in case of an inadvertent draindown of the reactor vessel~~;

b. Required features needed to mitigate a fuel handling accident are available;

c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The DC electrical power requirements for MODES 1, 2, and 3 are covered in LCO 3.8.4.

ACTIONS

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, or 3, would require the unit to be shutdown, but would not require immediate suspension of movement of irradiated fuel assemblies. The Note to the ACTIONS, "LCO 3.0.3 is not applicable," ensures that the actions for immediate suspension of irradiated fuel assembly movement are not postponed due to entry into LCO 3.0.3.

(continued)

BASES

ACTIONS (continued)

A.1, A.2.1, A.2.2, and A.2.3~~, and A.2.4~~

By allowance of the option to declare required features inoperable with associated DC electrical power subsystem(s) inoperable, appropriate restrictions are implemented in accordance with the affected system LCOs' ACTIONS. However, in many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS~~,~~ and movement of irradiated fuel assemblies in the secondary containment~~, and any activities that could result in inadvertent draining of the reactor vessel~~).

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystem and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the plant safety systems may be without sufficient power.

SURVEILLANCE REQUIREMENTS

SR 3.8.5.1

SR 3.8.5.1 requires certain Surveillances required by LCO 3.8.4 to be met. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required unless Unit 2 Specification 3.8.4, "DC Sources—Operating," requires performance of these SRs.

(continued)

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.8 Distribution Systems—Shutdown

BASES

BACKGROUND

A description of the AC and DC electrical power distribution system is provided in the Bases for LCO 3.8.7, "Distribution Systems—Operating."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume Engineered Safety Feature (ESF) systems are OPERABLE. The AC and DC electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded.

The OPERABILITY of the AC and DC electrical power distribution system is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum AC and DC electrical power sources and associated power distribution subsystems during MODES 4 and 5, and during movement of irradiated fuel assemblies in the secondary containment ensures that:

a. The facility can be maintained in the shutdown or refueling condition for extended periods;

b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and

c. Adequate power is provided to mitigate events postulated during shutdown, such as ~~an inadvertent draindown of the vessel or~~ a fuel handling accident.

The AC and DC electrical power distribution systems satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii) (Ref. 3).

(continued)

BASES (continued)

LCO

Various combinations of subsystems, equipment, and components are required OPERABLE by other LCOs, depending on the specific plant condition. Implicit in those requirements is the required OPERABILITY of necessary support features. This LCO explicitly requires energization of the portions of the electrical distribution system necessary to support OPERABILITY of Technical Specifications required systems, equipment, and components—both specifically addressed by their own LCO, and implicitly required by the definition of OPERABILITY. In addition, DC control power for operation of two of the four 4.16 kV emergency buses and two of the four 480 V emergency buses, as well as control power for two of the four diesel generators, is provided by the Unit 2 DC electrical power subsystems. Therefore, the Unit 2 DC electrical power distribution subsystems needed to support required components are also required to be OPERABLE.

In addition, it is acceptable for required buses to be cross-tied during shutdown conditions, permitting a single source to supply multiple redundant buses, provided the source is capable of maintaining proper frequency (if required) and voltage.

Maintaining these portions of the distribution system energized ensures the availability of sufficient power to operate the plant in a safe manner to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents ~~and inadvertent reactor vessel draindown~~).

APPLICABILITY

The AC and DC electrical power distribution subsystems required to be OPERABLE in MODES 4 and 5 and during movement of irradiated fuel assemblies in the secondary containment provide assurance that:

a. Systems that provide core cooling ~~to provide adequate coolant inventory makeup are available for the irradiated fuel in the core in case of an inadvertent draindown of the reactor vessel~~;

b. Systems needed to mitigate a fuel handling accident are available;

(continued)

BASES

APPLICABILITY (continued)

c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and

d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The AC and DC electrical power distribution subsystem requirements for MODES 1, 2, and 3 are covered in LCO 3.8.7.

ACTIONS

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 4 or 5, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, or 3, would require the unit to be shutdown, but would not require immediate suspension of movement of irradiated fuel assemblies. The Note to the ACTIONS, "LCO 3.0.3 is not applicable," ensures that the actions for immediate suspension of irradiated fuel assembly movement are not postponed due to entry into LCO 3.0.3.

A.1, A.2.1, A.2.2, A.2.3, and A.2.4~~, and A.2.5~~

Although redundant required features may require redundant divisions of electrical power distribution subsystems to be OPERABLE, one OPERABLE distribution subsystem division may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS~~,~~ and fuel movement~~, and operations with a potential for draining the reactor vessel~~. By allowing the option to declare required features associated with an inoperable distribution subsystem inoperable, appropriate restrictions are implemented in accordance with the affected distribution subsystem LCO's Required Actions. In many instances this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made, (i.e., to suspend CORE ALTERATIONS~~,~~ and movement of irradiated fuel assemblies in the secondary containment~~, and any activities that could result in inadvertent draining of the reactor vessel~~).

(continued)

BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4~~, and A.2.5~~ (continued)

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC and DC electrical power distribution subsystems and to continue this action until restoration is accomplished in order to provide the necessary power to the plant safety systems.

Notwithstanding performance of the above conservative Required Actions, a required residual heat removal-shutdown cooling (RHR-SDC) subsystem may be inoperable. In this case, Required Actions A.2.1 through A.2.~~4~~ 3 do not adequately address the concerns relating to coolant circulation and heat removal. Pursuant to LCO 3.0.6, the RHR-SDC ACTIONS would not be entered. Therefore, Required Action A.2.~~5~~ 4 is provided to direct declaring RHR-SDC inoperable and not in operation, which results in taking the appropriate RHR-SDC ACTIONS.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required distribution subsystems should be completed as quickly as possible in order to minimize the time the plant safety systems may be without power.

SURVEILLANCE REQUIREMENTS

SR 3.8.8.1

This Surveillance verifies that the AC and DC electrical power distribution subsystems are functioning properly, with the correct breaker alignment. The correct breaker alignment ensures power is available to each required bus. The verification of energization of the buses ensures that the required power is readily available for motive as well as control functions for critical system loads connected to these buses. This may be performed by verification of the absence of low voltage alarms or by verifying a load powered from the bus is operating. The 7 day Frequency takes into account the redundant capability of the electrical power distribution subsystems, as well as other indications available in the control room that alert the operator to subsystem malfunctions.

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BASES

BACKGROUND (continued)

The RCS hydrostatic and/or RCS system leakage tests require increasing reactor pressure to approximately 1050 psig. Scram time testing required by SR 3.1.4.1 and SR 3.1.4.4 requires reactor pressures ≥ 800 psig. Other testing may be performed in conjunction with the allowances for inservice leak or hydrostatic tests and control rod scram time tests.

APPLICABLE SAFETY ANALYSES

Allowing the reactor to be considered in MODE 4 when the reactor coolant temperature is > 212°F during, or as a consequence of, hydrostatic or leak testing, or as a consequence of control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test, effectively provides an exception to MODE 3 requirements, including OPERABILITY of primary containment and the full complement of redundant Emergency Core Cooling Systems. Since the tests are performed water solid, at low decay heat values, and near MODE 4 conditions, the stored energy in the reactor core will be very low. Under these conditions, the potential for failed fuel and a subsequent increase in coolant activity above the LCO 3.4.6, "RCS Specific Activity," limits are minimized. In addition, the secondary containment will be OPERABLE, in accordance with this Special Operations LCO, and will be capable of handling any airborne radioactivity or steam leaks that could occur during the performance of hydrostatic or leak testing. The required pressure testing conditions provide adequate assurance that the consequences of a steam leak will be conservatively bounded by the consequences of the postulated main steam line break outside of primary containment described in References 2 and 3. Therefore, these requirements will conservatively limit radiation releases to the environment.

In the unlikely event of ~~a large~~ any primary system leak that could result in draining of the RPV, the reactor vessel would rapidly depressurize~~, allowing the low pressure core cooling systems to operate~~. The make-up capability ~~of the low pressure coolant injection and core spray subsystems~~, as required in MODE 4 by LCO 3.5.2, "~~ECCS—Shutdown~~RPV WIC," would be more than adequate to keep the RPV water level above the TAF~~core flooded~~ under this low decay heat load condition. Small system leaks would be detected by leakage inspections before significant inventory loss occurred.

For the purposes of this test, the protection provided by normally required MODE 4 applicable LCOs, in addition to the secondary containment requirements required to be met by this Special Operations LCO, will ensure acceptable consequences during normal hydrostatic test conditions and during postulated accident conditions.

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