

## BASES

## BACKGROUND (continued)

The hydrostatic [and/or RCS System leakage] tests requires increasing pressure to approximately [ ] psig. Scram time testing required by SR 3.1.4.1 and SR 3.1.4.4 requires reactor pressure > [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 > 200°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 nearly 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 3.4.7, "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 Reference 2. 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, "*RPV WICECCS-Shutdown*," 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.