ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT (BFN) Units 1, 2, and 3

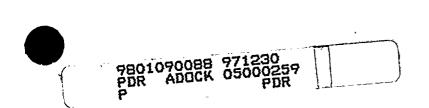
PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-395 MARKED PAGES

I. AFFECTED PAGE LIST

Unit 1 - pages 3.5/4.5-11, 3.5/4.5-29 Unit 2 - pages 3.5/4.5-11, 3.5/4.5-27 Unit 3 - pages 3.5/4.5-11, 3.5/4.5-30

II. MARKED PAGES

See attached.



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Table 3.5-1

NOV 05 1990

AMENDMENT NO. 176

Minimum RHRSW and EECW Pump Assignment

Time Limit	- 1 Unit Fueled (2 Units Defueled	2 Units Fueled (1 Unit Defueled)	3 Units Fueled
	RHRSW EECW(A)	RHRSW EECW(A)	RHRSW EECW(A)
None	$\begin{array}{c} 4 \\ \overbrace{4}{} \\ \overbrace{4}{} \\ \overbrace{4}{} \\ \overbrace{2}{} \\ \overbrace{4}{} \\ \overbrace{2}{} \\ \overbrace{2}{} \\ \overbrace{4}{} \\ \overbrace{2}{} \\ \overbrace{2}{ \\ 2} \\ \overbrace{2}{ \atop 2} \\ 2} \\ \overbrace{2}{ \atop 2} \\ 2} \\ \overbrace{2}{ \atop 2} \\ 2} \\ 2} \\ 2} \\ 2} \\ 2} \\ 2} \\ 2}$	$\frac{-5\pi}{5}$ and 3 $(S(B)(D) \circ R (b))$	$\frac{7}{8}$ and 3
30 Days	3 and 2	5 and 2 (or) 4 and 3	7 and 2 (or) 6 and 3
7 Days	$-\frac{2}{2}$ and 2	4 and 2	6 and 2

Note:

- (A) At least one OPERABLE pump must be assigned to each header. Only automatically starting pumps may be assigned to EECW header service.
- (B) When each pump is supplied from a separate 4-kv shutdown board.
- (C) This condition is satisfied with 2 RHRSW pumps when each pump is aligned to a separate RHRSW header.
- (D) For units with fuel loaded, the minimum RHRSW pump requirements may be reduced by one pump for each unit that has been in the COLD SHUTDOWN condition for more than 24 hours.



BFN Unit l 3.5/4.5-11

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When the decay heat

sufficiently following

level has decreased

shutdown cooling

adequately handled

by one RHR heat

load can be

exchanger.

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are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2. or D2) and one on alternate assignment (A1, B1, C1, or D1). One shutdown, the entire RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation. A

> The RHR Service Water System was designed as a shared system for three units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow. continued operation if the actual system cooling requirements can be assured.

Since the standby coolant supply capability provides added long term redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system pump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability, a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

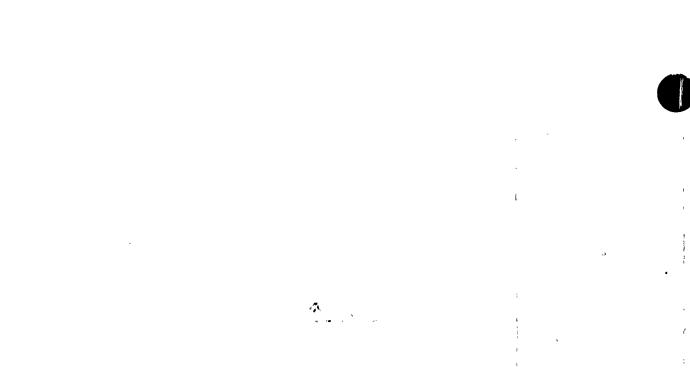
Equipment_Area_Coolers 3.5.D

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

The minimum number of RHRSW pumps which are required to be operable by this specification ensure Sat the RHRSW vstem will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single < failure of diesel generator A or B which would result in (the loss of two RHRSW pumps.

> BFN Unit 1

3.5/4.5-29



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--- Table 3.5-1

NOV 05 1990

Minimum RHRSW and EECW Pump Assignment

Time Limit		Fueled Defueled)			Fueled fueled)	3 (Jnits	Fueled
	RHRSW	EECW(A)	RHRS	W]	EECW(A)		ŚW	EECW(A)
None	-4- and F 4(4 3 4 3	5 K (B)	and (b)	3 0R6(D)	7	and	3
30 Days	3 and	1 2	-ig-	and (or) and	3	7 6	and (or) and	2
7 Days	-2- and 2((1 2 2) 2)	4	and	2	6	and	2

Note:

- (A) At least one OPERABLE pump must be assigned to each header. Only automatically starting pumps may be assigned to EECW header service.
- (B) When each pump is supplied from a separate 4-kv shutdown board.
- (C) This condition is satisfied with 2 RHRSW pumps when each pump is aligned to a separate RHRSW header.
- (D) For units with fuel loaded, the minimum RHRSW pump requirements may be reduced by one pump for each unit that has been in the COLD SHUTDOWN condition for more than 24 hours.

BFN Unit 2

3.5/4.5-11

AMENDMENT NO. 179

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3.5 <u>BASES</u> (Cont'd)

AMENDMENT NO. 240

are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2, or D2) and one on alternate assignment (A1, B1, C1, or D1). One RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation.

The minimum number of RHRSW pumps which are required to be operable by this specification ensures

the RHRSW tem will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single failure of diesel generator A or B which would result in the loss of two RHRSW pumps.

units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow continued operation if the actual system cooling requirements can be assured.

The RHR Service Water System was designed as a shared system for three

Since the standby coolant supply capability provides added long term (redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system rump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability; a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

3.5.D Equipment Area Coolers

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

3.5/4.5-27

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When the decay heat

level has decreased

sufficiently following

shutdown, the entire

shutdown cooling

adequately handled

by one RHR heat

load can be

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Table 3.5-1

NOV 05 1990

Minimum RHRSW and EECW Pump Assignment

- Time Limit		Fueled Defueled)			Fueled fueled)	3 U	Inits	Fueled
	RHRSW	EECW(A)	RHRS		EECW(A)	RHRS	W	EECW(A)
None	-4- an -4- (1)		5(8	and (D)	3 DRGDY	74	and SCD	3
30 Days	3 and	i 2	4	and (or) and	3	7 6	and (or) and	2 3
7 Days	-2 and -2	1 2	4	and	2	6	and	2

Note:

- (A) At least one OPERABLE pump must be assigned to each header. Only automatically starting pumps may be assigned to EECW header service.
- (B) When each pump is supplied from a separate 4-kv shutdown board.
- (C) This condition is satisfied with 2 RHRSW pumps when each pump is aligned to a separate RHRSW header.
- (D) For units with fuel loaded, the minimum RHRSW pump requirements may be reduced by one pump for each unit that has been in the COLD SHUTDOWN condition for more than 24 hours.

BFN Unit 1 3.5/4.5-11

AMENDMENT NO. 176

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3.5 <u>BASES</u> (Cont'd)

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are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2, or D2) and one on alternate assignment (A1, B1, C1, or D1). One RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation.

The RHR Service Water System was designed as a shared system for three units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. A If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow continued operation if the actual system cooling requirements can be assured.

Since the standby coolant supply capability provides added long term redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system pump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term 'fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability, a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

3.5.D Equipment Area Coolers

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

When the decay heat level has decreased sufficiently following shutdown, the entire shutdown cooling load can be adequately handled by one RHR heat exchanger.

The minimum number of RHRSW pumps which are required to be

erable by this specification ensure that the RHRSW system will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single failure of diesel generator A or B which would result in the loss of two RHRSW pumps.

3.5/4.5-30

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ENCLOSURE 3

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT (BFN) Units 1, 2, and 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-395 REVISED PAGES

I. AFFECTED PAGE LIST

Unit	1	Pages	3.5/4.5-11,	3.5/4.5-29
Unit	2	Pages	3.5/4.5-11,	3.5/4.5-27
Unit	3	Pages	3.5/4.5-11,	3.5/4.5-30

II. REVISED PAGES

See attached.

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Table 3.5-1

	Time Limit	1 Unit (2 Units			Jnits Fu nit Defu		3 บ	nits :	Fueled
		RHRSW	EECW(A)	RHRSW	EECW	'(A)	RHRS	V EEC	W(A)
	None	4(D) and	3	5(B)(D) and	3	8(D)	and	3
					(or)				
1				6(D)	and	3			
	30 Days	3 and	2	5	and	2	7	and	2
	-				(or)			(or)	
				4	and	3	6	and	3
ł	7 Days	2(C) and	2	4	and	2	6	and	2

Minimum RHRSW and EECW Pump Assignment

Note:

- (A) At least one OPERABLE pump must be assigned to each header. Only automatically starting pumps may be assigned to EECW header service.
- (B) When each pump is supplied from a separate 4-kv shutdown board.
- (C) This condition is satisfied with 2 RHRSW pumps when each pump is aligned to a separate RHRSW header.
- (D) For units with fuel loaded, the minimum RHRSW pump requirements may be reduced by one pump for each unit that has been in the COLD SHUTDOWN CONDITION for more than 24 hours.

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3.5 <u>BASES</u> (Cont'd)

are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2, or D2) and one on alternate assignment (A1, B1, C1, or D1). One RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation. When the decay heat level has decreased sufficiently following shutdown, the entire shutdown cooling load can be adequately handled by one RHR heat exchanger.

The RHR Service Water System was designed as a shared system for three units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. The minimum number of RHRSW pumps which are required to be OPERABLE by this specification ensures that the RHRSW System will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single failure of diesel generator A or B which would result in the loss of two RHRSW pumps. If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow continued operation if the actual system cooling requirements can be assured.

Since the standby coolant supply capability provides added long term redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system pump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability, a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

3.5.D Equipment Area Coolers

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

BFN Unit 1 -.

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Table 3.5-1

Minimum RHRSW and EECW Pump Assignment

	Time Limit		nit Fu its De	ueled efueled)	-	Units Fu Jnit Defi		3 t	Jnits	Fueled
		RHRSW	EI	ECW(A)	RHRSW	EEC	V(A)	RHRS	W EE	CW(A)
	None	4(D)	and	3	5(B)(D) and (or)	3	8(D)	and	3
					6(D)	and	3			
	30 Days	3	and	2	5	and (or)	2	7	and (or)	2
					4	and	3	6	and	3
-	7 Days	2(C)	and	2	4	and	2	6	and	2

Note:

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- (A) At least one OPERABLE pump must be assigned to each header. Only automatically starting pumps may be assigned to EECW header service.
- (B) When each pump is supplied from a separate 4-kv shutdown board.
- (C) This condition is satisfied with 2 RHRSW pumps when each pump is aligned to a separate RHRSW header.
- (D) For units with fuel loaded, the minimum RHRSW pump requirements may be reduced by one pump for each unit that has been in the COLD SHUTDOWN CONDITION for more than 24 hours.

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3.5 <u>BASES</u> (Cont'd)

are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2, or D2) and one on alternate assignment (A1, B1, C1, or D1). One RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation. When the decay heat level has decreased sufficiently following shutdown, the entire shutdown cooling load can be adequately handled by one RHR heat exchanger.

The RHR Service Water System was designed as a shared system for three units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. The minimum number of RHRSW pumps which are required to be OPERABLE by this specification ensures that the RHRSW System will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single failure of diesel generator A or B which would result in the loss of two RHRSW pumps. If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow continued operation if the actual system cooling requirements can be assured.

Since the standby coolant supply capability provides added long term redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system pump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability, a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

3.5.D Equipment Area Coolers

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

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Table 3.5-1

Minimum RHRSW and EECW Pump Assignment

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	Time Limit	1 Unit Fueled (2 Units Defueled)	2 Units Fueled (1 Unit Defueled)	3 Units Fueled
		RHRSW EECW(A)	RHRSW EECW(A)	RHRSW EECW(A)
1	None	4(D) and 3	5(B)(D) and 3	8(D) and 3
			(or)	
1			6(D) and 3	
	30 Days	3 and 2	5 and 2	7 and 2
			(or)	(or)
			4 and 3	6 and 3
-	7 Days	2(C) and 2	4 and 2	6 and 2

Note:

- At least one OPERABLE pump must be assigned to each header. Only (A) automatically starting pumps may be assigned to EECW header service.
- When each pump is supplied from a separate 4-kv shutdown board. (B)
- This condition is satisfied with 2 RHRSW pumps when each pump is aligned (C) to a separate RHRSW header.
- For units with fuel loaded, the minimum RHRSW pump requirements may be (D) reduced by one pump for each unit that has been in the COLD SHUTDOWN CONDITION for more than 24 hours.

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3.5 <u>BASES</u> (Cont'd)

are not safety related, are able to be fed from both headers thus assuring continuity of operation if either header becomes inoperable. The control air compressors only use the EECW north header as an emergency backup supply.

There are four RHR heat exchanger headers (A, B, C, & D) with one RHR heat exchanger from each unit on each header. There are two RHRSW pumps on each header; one normally assigned to each header (A2, B2, C2, or D2) and one on alternate assignment (A1, B1, C1, or D1). One RHR heat exchanger header can adequately deliver the flow supplied by both RHRSW pumps to any two of the three RHR heat exchangers on the header. One RHRSW pump can supply the full flow requirement of one RHR heat exchanger. Two RHR heat exchangers can more than adequately handle the cooling requirements of one unit in any abnormal or postaccident situation. When the decay heat level has decreased sufficiently following shutdown, the entire shutdown cooling load can be adequately handled by one RHR heat exchanger.

The RHR Service Water System was designed as a shared system for three units. The specification, as written, is conservative when consideration is given to particular pumps being out of service and to possible valving arrangements. The minimum number of RHRSW pumps which are required to be OPERABLE by this specification ensures that the RHRSW System will satisfy its safety functions for all three units following a design basis event on one unit and a postulated single active failure. This includes a single failure of diesel generator A or B which would result in the loss of two RHRSW pumps. If unusual operating conditions arise such that more pumps are out of service than allowed by this specification, a special case request may be made to the NRC to allow continued operation if the actual system cooling requirements can be assured.

Since the standby coolant supply capability provides added long term redundancy to the other emergency and containment cooling systems, a 5-hour time to establish flow path availability is allowed. This time limit does not reduce the other requirements associated with RHRSW/EECW system pump operability.

Should one of the two RHRSW pumps normally or alternately assigned to the RHR heat exchanger header supplying the standby coolant supply connection become inoperable, an equal capability for long-term fluid makeup to the unit reactor and for cooling of the unit containment remains OPERABLE. Because of the availability of an equal makeup and cooling capability, a 30-day repair period is justified. Should the capability to provide standby coolant supply be lost, a 10-day repair time is justified based on the low probability for ever needing the standby coolant supply.

With only one unit fueled, four RHRSW pumps are required to be OPERABLE for indefinite operation to meet the requirements of Specification 3.5.B.1 (RHR system). If only three RHRSW pumps are OPERABLE, a 30-day LCO exists because of the requirement of Specification 3.5.B.5 (RHR system).

3.5.D Equipment Area Coolers

There is an equipment area cooler for each RHR pump and an equipment area cooler for each set (two pumps, either the A and C or B and D pumps) of core spray pumps. The equipment area coolers take suction

BFN Unit 3 3.5/4.5-30

ENCLOSURE 4

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT (BFN) Units 1, 2, and 3

PROPOSED IMPROVED TECHNICAL SPECIFICATION (TS)CHANGE TS-395 MARKED PAGES

I. AFFECTED PAGE LIST

Unit 1 - pages 3.7-1 through -3, B3.7-1 through -6Unit 2 - pages 3.7-1 through -3, B3.7-1 through -6Unit 3 - pages 3.7-1 through -3, B3.7-1 through -6

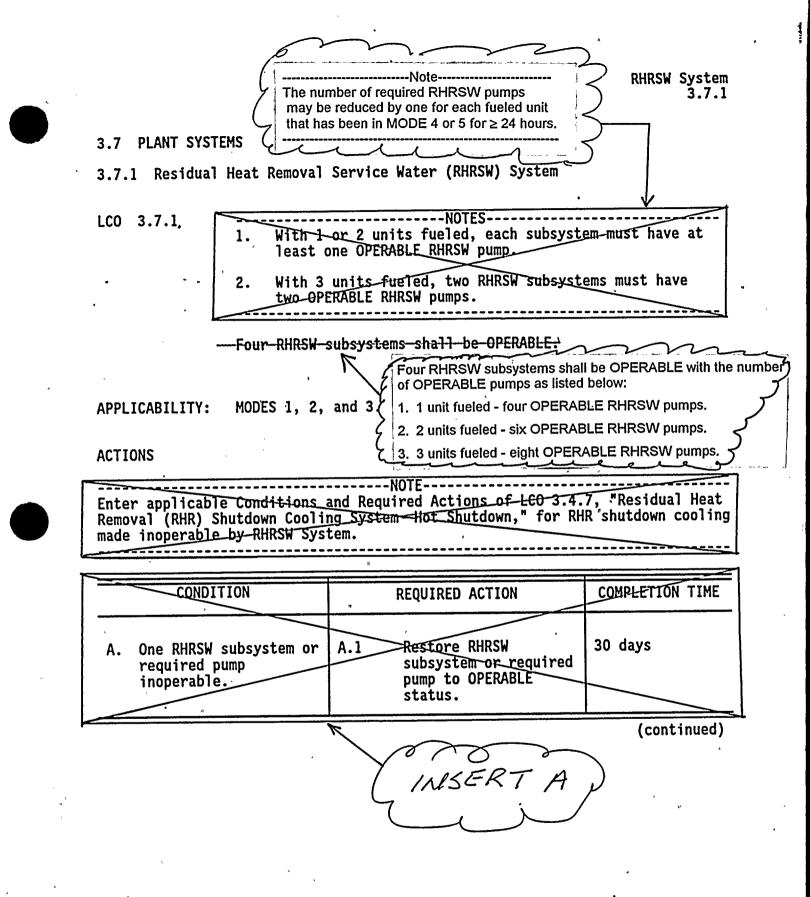
II. REVISED PAGES

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BFN-UNIT 1

Amendment

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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required RHRSW pump inoperable.	 A.1Notes	Immediately 30 days

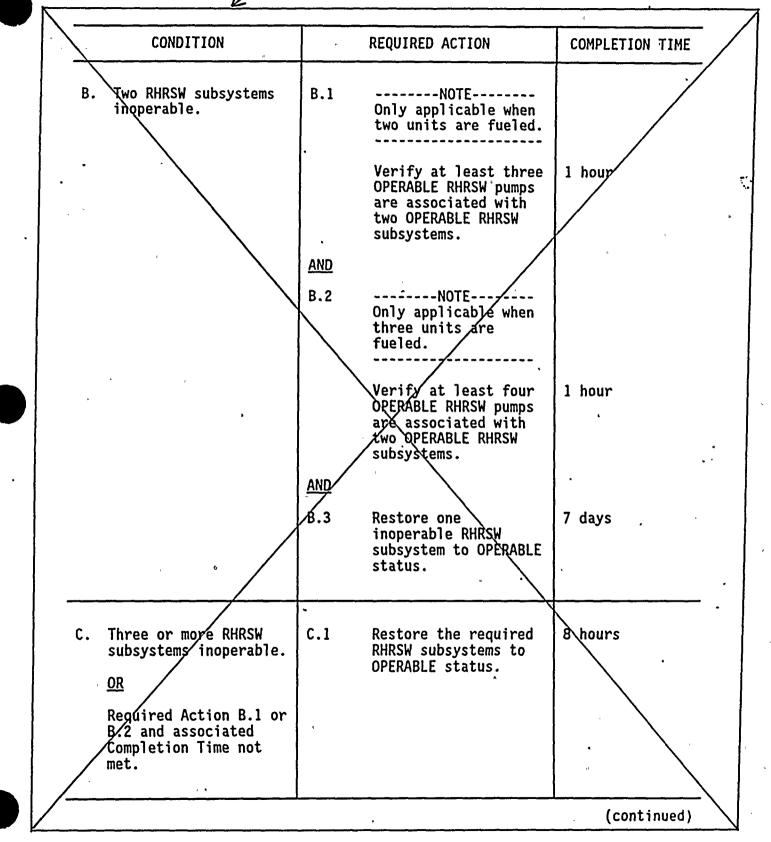
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(IMSERT B)

RHRSW System 3.7.1



BFN-UNIT 1

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	CONDITION		REQUIRED ACTION	COMPLETION TIM
В.	One RHRSW subsystem inoperable.	B.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for RHR shutdown cooling made inoperable by the RHRSW system. 	30 days
c.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status	7 days
D.	Two RHRSW subsystems inoperable.	D.1	Note Enter applicable conditions and Required actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System.	
			Restore one RHRSW subsystem to OPERABLE status.	7 days
E.	Three or more required RHRSW pumps inoperable	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW system.	
			Restore one RHRSW subsystem to OPERABLE status.	8 hours ,

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RHRSW System 3.7.1

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D. Required Action A.1, B.3, or C.1 and associated Completion Time not met. D.1 Be in MODE 3. 12 hours J.2 Be in MODE 4. 36 hours SURVEILLANCE REQUIREMENTS J.2 Be in MODE 4. 36 hours SURVEILLANCE REQUIREMENTS SURVEILLANCE FREQUENCY SR 3.7.1.1 Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. 31 days CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion Time not met. G.1 Be in MODE 3. 12 hours	CONDITION	REQUIRED ACTION	COMPLETION TIME
Time not met. D.2 Be in MODE 4. 36 hours SURVEILLANCE REQUIREMENTS SURVEILLANCE FREQUENCY SR 3.7.1.1 Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. 31 days CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion	B.3, or C.1 and		12 hours
SURVEILLANCE FREQUENCY SR 3.7.1.1 Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. 31 days CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion G.1 Be in MODE 3. 12 hours	Time not met.		36 hours
SURVEILLANCE FREQUENCY SR 3.7.1.1 Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. 31 days CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion G.1 Be in MODE 3. 12 hours	7		
SR 3.7.1.1 Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. 31 days CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion G.1 Be in MODE 3. 12 hours	SURVEILLANCE REQUIREMENTS		
valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position. CONDITION REQUIRED ACTION CONDITION REQUIRED ACTION COMPLETION T G. Required Action and associated Completion	SUF	VEILLANCE	FREQUENCY
G. Required Action and G.1 Be in MODE 3. 12 hours	valve in th sealed, or is in the c	e flow path, that is not locke otherwise secured in position, correct position or can be	d,
G. Required Action and G.1 Be in MODE 3. 12 hours			
associated Completion	CONDITION	REQUIRED ACTION	COMPLETION TIM
			12 hours
G.2 Be in MODE 4. 36 hours	associated Completion		

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B 3.7 PLANT SYSTEMS -

BASES

B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

BACKGROUND The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System. The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit.following-a-design-basis-accident. -However,-one-pump-is-capable-of-providing-sufficient-cooling--capacity_to_maintain_a_safe_shutdown_condition_for_each-of--the-non-accident-units. As such, a subsystem consists of a loop with one or two OPERABLE pumpsydependent-upon-the--number of fueled-units. The RHRSW System is designed with sufficient redundancy so that no single active component failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 (Ref. 1).

> Cooling water is pumped by the RHRSW pumps from the Wheeler Reservoir through the tube side of the RHR heat exchangers, and discharged back to the Wheeler Reservoir.

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal <u>is manually overridden or</u> clears, and is assumed to be manually started within 10 minutes after the LOCA.

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, a heat exchanger, a suction ² source, and associated valves,

piping and instrumentation.

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RHRSW System B 3.7.1

BASES (continued)

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the associated RHR System is assumed to occur 10 minutes after a DBA. The RHRSW flow assumed in the analyses is 4500 gpm per pump with two pumps operating in one loop. In this case, 4000 the maximum suppression chamber water temperature and pressure are 177°F (as reported in Reference 7) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig. -- This-is also-below-the-200°F-limit-imposed-by-Design-Criteria-BFN-50-7064A-(Ref.-5)-for-all-plant-transients-involving-SRVoperations.

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 6).

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In addition to the required number of OPERABLE subsystems, there must be an adequate number of operate the fueled non-accident in the fueled non-accident in the fueled non-accident in the number of required BLE to provide the required number of OPERABLE RHRSW pumps one RHRSW pumps one RHRSW pumps one required is modified by a Note which specifies that the number of sequired RHRSW pumps may be for each fueled units are fueled, the addition to the required RHRSW pumps one for each fueled units are fueled. An OPERABLE RHRSW pumps may be found of the fueled of the fueled units fueled is that the number of sequired RHRSW pumps may be for each fueled units are fueled. An OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate. The loc is modified by two-Notes. Note second the fueled on the second the of the RHRSW subsysteme must, have two OPERABLE RHRSW pumps. With at least one OPERABLE to support the OPERABLE THRSW subsysteme must, head the fact that decay when 3 more fueled. The MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABLE TO Second the RHRSW subsysteme must, have two OPERABLE RHRSW pumps. With at least one OPERABLE to support the OPERABLITY of the RHR System for primary containment cooling (LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Suppress	BASES (continued)	at on the number of units fueled.
	addition to the required number OPERABLE subsystems, there ust be an adequate number of umps OPERABLE to provide boling for the fueled non-accident nits. The number of required PERABLE RHRSW pumps quired is modified by a Note hich specifies that the number of quired RHRSW pumps may be duced by one for each fueled unit at has been in MODE 4 or 5 for rer 24 hours. This Note knowledges the fact that decay at removal requirements are bstantially reduced for fueled Mode 4 or 5 for over 24 APPLICABILITY	the required redundancy to ensure that the system functions to remove post accident heat loads, assuming the worst case single active failure occurs coincident with the loss of offsite power An OPERABLE RHRSW subsystem consists of
	 	-applicable-Conditions-of-LCO-3.4.7-be-entered-and-Required- -Actions-taken-if-the-inoperable-RHRSW-subsystem-results_in -inoperable_RHR_shutdown_coolingThis_is_an-exception-to -LCO-3.0.6-and-ensures-the-proper-actions-are-taken-for-these

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BASES

ACTIONS (continued)

With one RHRSW subsystem or required pump inoperable, the inoperable RHRSW subsystem or required pump must be restored to ORERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

INSERT C

B.1, B.2 and B.3

A.1

Required Action B.1 requires verification that at least three OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems. The Required Action is modified by a Note indicating that the required action is applicable only when two units are fueled. Required Action B.2 requires verification that at least four OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems. The Required Action is modified by a Note indicating that the required action is applicable only when three units are fueled.

Required Action B.3 requires that with two RHRSW subsystems inoperable, one inoperable RHRSW subsystem be restored to OPERABLE status within 7 days. With the unit(s) in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystems could result in loss of RHRSW function. The 7 day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystems and the low probability of an event occurring requiring RHRSW during this period.

<u>C.1</u>

With three or more RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function.

(continued)

Amendment

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Insert C

A.1_and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE. The Required Action is modified by two Notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition a single failure (loss of a 4kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps operable with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4kV shutdown boards to be OPERABLE if the other fueled unit has been in Mode 4 or 5 for over 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

If Required action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

<u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

<u>C.1</u>

With two required RHRSW pumps inoperable the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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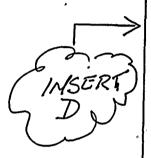
RHRSW System B 3.7.1

BASES

ACTIONS

<u>C.1 (continued)</u>

The requisite number of subsystems and pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.



<u>D.1 and D.2</u>

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Fimes, the unit must be placed in a MODE in which the LCO does not apply. 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.

SURVEILLANCE REQUIREMENTS

<u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position. This is acceptable because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

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With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 7 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

<u>E.1</u>

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

<u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

G.1 and G.2

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.

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REFERENC	ES 1.	FSAR, Section 10.9.
	2.	FSAR, Chapter 5.
	. 3.	FSAR, Chapter 14.
	· 4.	FSAR, Section 14.6.3.3.2.
t	5	Design-Criteria-BFN-50-7064A,-Primary-Containment SystemsUnits-2-and-3-
	(5)>-6.	NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
	(6) → -7-	GE-NE-B13-01755-2, Revision 1, February 1996.

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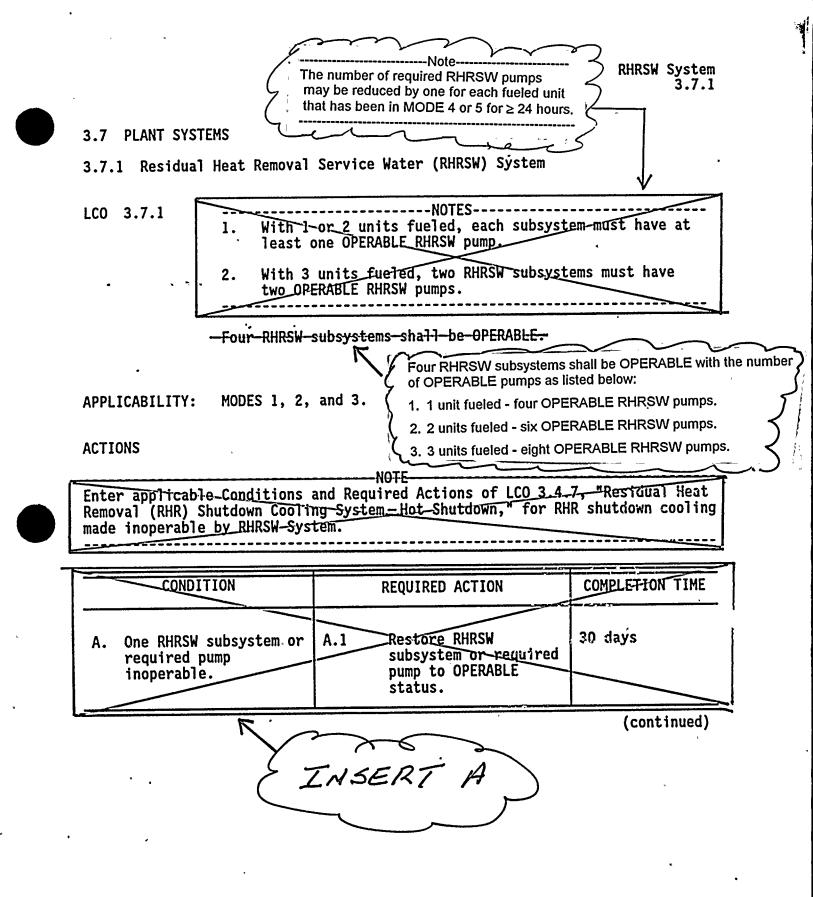
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CONDITION			REQUIRED ACTION	COMPLETION TIME	
Α.	One required RHRSW pump inoperable.	A.1	 NotesNotes Only applicable for the 2 units fueled condition. Only four RHRSW pumps powered from a separate 4kV shutdown board are required to be OPERABLE if the other fueled unit has been in MODE 4 or 5 for ≥ 24 hours. 	Immediately 30 days	
		-	Verify 5 RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE.	ou days	
		OR	, U		
		A.2	Restore required RHRSW pump to OPERABLE status.		

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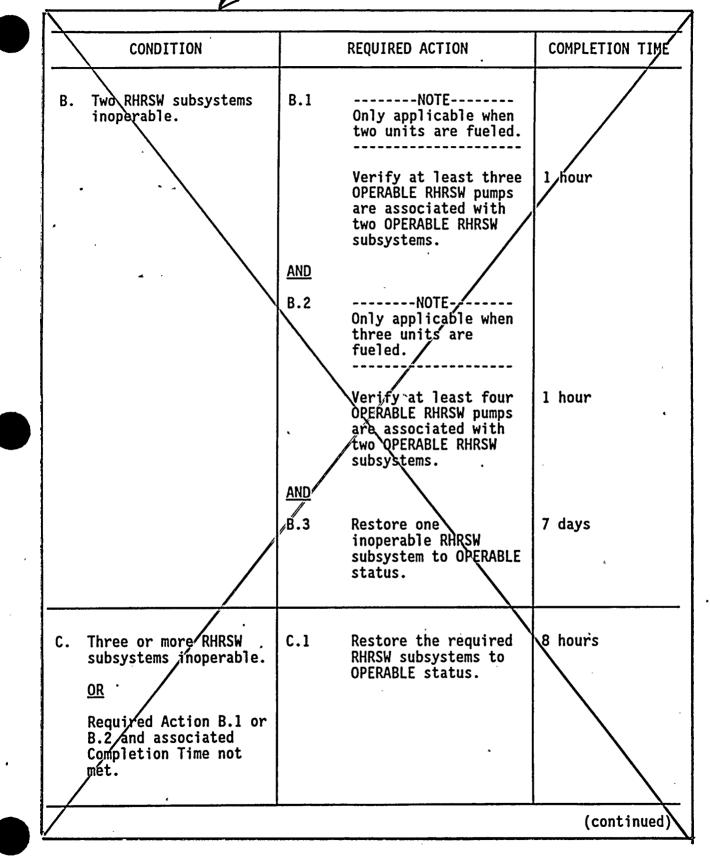
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RHRSW System 3.7.1



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	CONDITION		REQUIRED ACTION	COMPLETION TIME
в.	One RHRSW subsystem inoperable.	B.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for RHR shutdown cooling made inoperable by the RHRSW system. Restore RHRSW subsystem to OPERABLE status.	30 days
C.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status	7 days
D.	Two RHRSW subsystems inoperable.	D.1	Note Enter applicable conditions and Required actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System.	
			Restore one RHRSW subsystem to OPERABLE status.	7 days
E.	Three or more required RHRSW pumps inoperable	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW system.	
			Restore one RHRSW subsystem to OPERABLE status.	8 hours

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CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action A.1, B.3, or C.1 and associated Completio		12 hours
Time not met.	D.2 Be in MODE 4.	36 hours
7	· · ·	
SURVEILLANCE REQUIREMENTS		
S	URVEILLANCE	FREQUENCY
valve in sealed, o is in the	ch RHRSW manual and power oper the flow path, that is not loc r otherwise secured in position correct position or can be o the correct position.	ked,
		<u></u>
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CONDITION	REQUIRED ACTION	COMPLETION TIME
CONDITION G. Required Action and associated Completion Time not met.	REQUIRED ACTION G.1 Be in MODE 3. AND	COMPLETION TIME 12 hours
G. Required Action and associated Completion	G.1 Be in MODE 3.	
G. Required Action and associated Completion	G.1 Be in MODE 3.	12 hours

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### B 3.7 PLANT SYSTEMS

B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

BASES

BACKGROUND The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System.

> The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit.following-a-design-basis-accident ---However,-one-pump-is-capable-of-providing_sufficient_cooling_ the_non-accident_units__ As such, a subsystem consists of a loop with one or two OPERABLE pumps-dependent-upon-the----number-of-fueled-units-- The RHRSW System is designed with sufficient redundancy so that no single active component. failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 (Ref. 1).

Cooling water is pumped by the RHRSW pumps from the Wheeler Reservoir through the tube side of the RHR heat exchangers, and discharged back to the Wheeler Reservoir.

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal-is-manually-overridden-or---clears, and is assumed to be manually started within 10 minutes after the LOCA.



**BFN-UNIT 2** 

, a heat exchanger, a suction

source, and associated valves, piping and instrumentation.

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RHRSW System B 3.7.1

### BASES (continued)

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

> The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the associated RHR System is assumed to occur 10 minutes after a The RHRSW flow assumed in the analyses is-4500-gpm per DBA. pump with two pumps operating in one loop. In this case, the maximum suppression chamber water temperature and 4000 pressure are 177°F (as reported in Reference 7) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig. --This-is also-below-the-200°F-1.imit-imposed-by-Design-Griteria--BFN-50-7064A-(Ref.-5)-for-all-plant-transients-involving-SRVoperations.....

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 6).

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Amendment

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LO       For RHRSW subsystems are required to be OPERABLE to provide to remove post accident heat loads, assuming the routs case adequate number of required redundancy to ensure that the system system functions ingle active failure occurs coincident with the loss of offsite power.         An OPERABLE subsystems, there must be adequate number of required redundancy to ensure that the system system functions ingle active failure occurs coincident with the loss of offsite power.         An OPERABLE RHRSW pumps required is modified by a Not write addition to more of required RHRSW subsystem consists of the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate.         An OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate.         An OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate.         An OPERABLE The power.         Are the order of fried unit that decay heat encode of of fored at the of of for over 24.         Are the order of the order of the order of the requirements are subsected.         Applicability         Area to a converted and the company in the flow path capable of taking suction for the requirements are subsected.         Area to a converted at the accuration the order of the requirements are subsected.         Area to a structure and transferring the water to the requirements are subsected.         Area to a structure and transferring the water to the requirements of the requirement area	. S BFN	tionally, since the RHRSW pumps are shared between the three units, the number of OPERABLE pumps required is also ndent on the number of units fueled. d)
	In addition to the required number of OPERABLE subsystems, there must be an adequate number of pumps OPERABLE to provide cooling for the fueled non-accident units. The number of required OPERABLE RHRSW pumps required is modified by a Note which specifies that the number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for over 24 hours. This Note acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in Mode 4 or 5 for over 24	the required redundancy to ensure that the system functions to remove post accident heat loads, assuming the worst case single active failure occurs coincident with the loss of offsite power. An OPERABLE RHRSW subsystem consists of 
(continued)	•	applicable_Conditions_of_LCO_3.4.7_be_entered_and_Required Actions_taken_if_the_inoperable_RHRSW_subsystem_results_in inoperable_RHR_shutdown_cooling,This_is_an-exception-to LCO-3.0.6-and-ensures_the-proper_actions_are_taken_for_these
		_(continued)

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RHRSW System B 3.7.1

BASES

ACTIONS (continued)

With one RHRSW subsystem or required pump inoperable, the inoperable RHRSW subsystem or required pump must be restored to ORERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

INSER

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

<u>A.1</u>

Required Action B.1 requires verification that at least three OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems. The Required Action is modified by a Note indicating that the required action is applicable only when two units are fueled. Required Action B.2 requires verification that at least four OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems. The Required Action is modified by a Note indicating that the required action is applicable only when three units are fueled.

Required Action B.3 requires that with two RHRSW subsystems inoperable, one inoperable RHRSW subsystem be restored to OPERABLE status within 7 days. With the unit(s) in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystems could result in loss of RHRSW function. The 7 day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystems and the low probability of an event occurring requiring RHRSW during this period.

<u>C.1</u>

With three or more RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function.

(continued)

**BFN-UNIT 2** 

Amendment

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## Insert C

## A.1 and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE. The Required Action is modified by two Notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition a single failure (loss of a 4kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps operable with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4kV shutdown boards to be OPERABLE if the other fueled unit has been in Mode 4 or 5 for over 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

If Required action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

## <u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

## <u>C.1</u>

With two required RHRSW pumps inoperable the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

RHRSW System B 3.7.1

# ACTIONS

BASES

## C.1-(continued)

The requisite number of subsystems and pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time-is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

# <u>D.1 and D.2</u>

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.

#### SURVEILLANCE REQUIREMENTS

## <u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position. This is acceptable because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

(continued)



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### Insert D

With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 7 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

## <u>E.1</u>

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

## <u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

## G.1 and G.2

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.



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REFERENCES 1. FSAR, Section 10.9.

2. FSAR; Chapter 5.

3. FSAR, Chapter 14.

4. FSAR, Section 14.6.3.3.2.

-5.---Design-Criteria-BFN-50-7064A,-Primary-Containment---Systems---Units-2-and-3----

-6.- NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.

-7.- GE-NE-B13-01755-2, Revision 1, February 1996.

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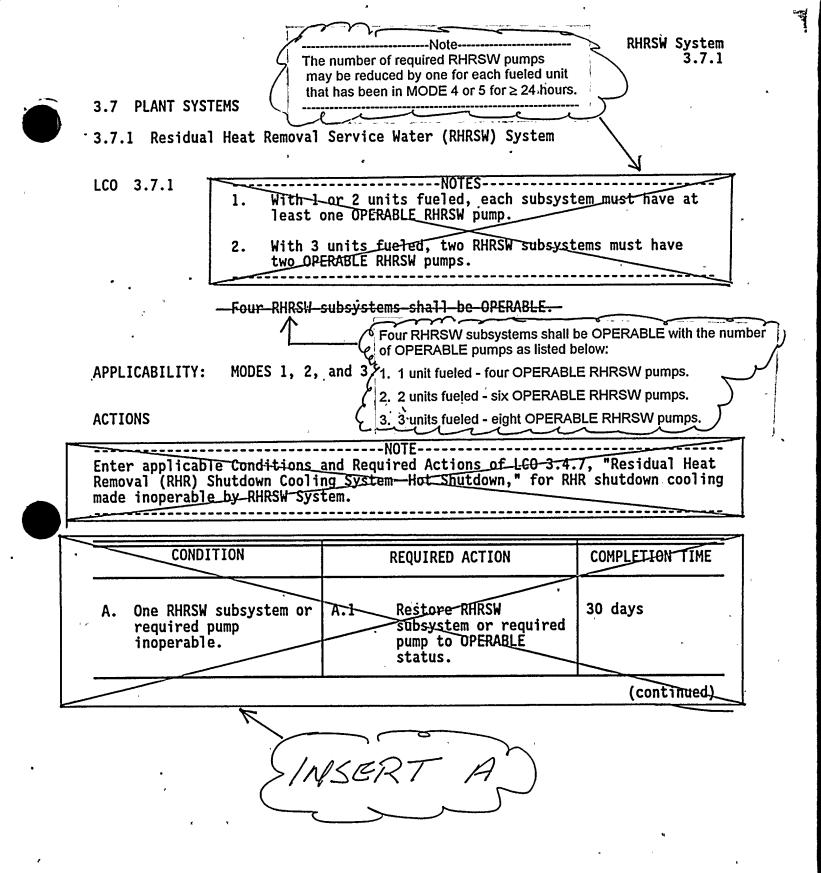
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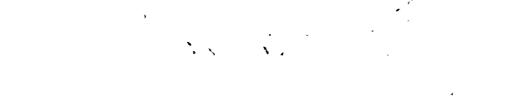


















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ı	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One required RHRSW pump inoperable.	A.1	<ol> <li>Only applicable for the 2 units fueled condition.</li> <li>Only four RHRSW pumps powered from a separate 4kV shutdown board are required to be OPERABLE if the other fueled unit has been in MODE 4 or 5 for ≥ 24 hours.</li> </ol>	Immediately 30 days
4.	T	OR	Verify 5 RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE.	
• •		A.2	Restore required RHRSW pump to OPERABLE status.	

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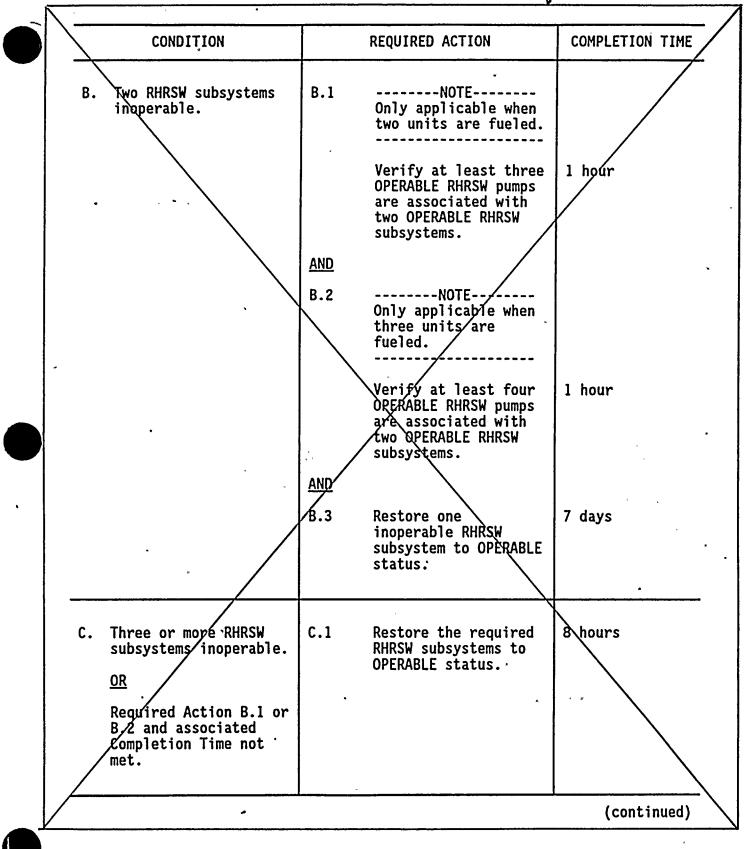
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RHRSW System 3.7.1

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**BFN-UNIT 3** 

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CONDITION		REQUIRED ACTION		COMPLETION TIME
Β.	One RHRSW subsystem inoperable.	B.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for RHR shutdown cooling made inoperable by the RHRSW system.  Restore RHRSW subsystem to OPERABLE status.	30 days
C.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status	7 days
D.	Two RHRSW subsystems inoperable.	D.1	Enter applicable conditions and Required actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System.	
			Restore one RHRSW subsystem to OPERABLE status.	7 days
E.	Three or more required RHRSW pumps inoperable	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Note Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW system.	
			Restore one RHRSW subsystem to OPERABLE status.	8 hours

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RHRSW System 3.7.1 2

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CONDITION	REQUIRED ACTION	COMPLETION TIME	
B.3, or C.1 and	D.1 Be in MODE 3.	12 họurs	
	D.2 Be in MODE 4.	-36 hours	
<u>1</u> .	······································		
SURVEILLANCE REQUIREMENTS			
SURVE	ILLANCE	FREQUENCY	
valve in the f sealed, or oth is in the corr	RSW manual and power operated Tow path, that is not locked, nerwise secured in position, rect position or can be e correct position.	31 days	
× *		<u>↓</u>	
		- 	
CONDITION	REQUIRED ACTION	COMPLETION TIME	
	G.1 Be in MODE 3.	12 hours	
G. Required Action and	G.I De li Mode di		
G. Required Action and associated Completion Time not met.	AND ·		
associated Completion		36 hours	

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## **B 3.7 PLANT SYSTEMS**

B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

BASES

BACKGROUND

The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System.

The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit, following-a-design-basis-accident. -However,-one-pump-is-capable-of-providing-sufficient-cooling--capacity-to-maintain-a-safe-shutdown-condition-for-each-of-sufficient redundancy so that no single active component failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 , a heat exchanger, a suction (Ref. 1).

source, and associated valves, Cooling water is pumped by the RHRSW pumps from the Wheeler piping and instrumentation. Reservoir through the tube side of the RHR heat exchangers,

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal <u>-is_manually_overridden_or___</u> clears, and is assumed to be manually started within 10 minutes after the LOCA.



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RHRSW System B 3.7.1

## BASES (continued).

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the associated RHR System is assumed to occur 10 minutes after a DBA. The RHRSW flow assumed in the analyses is 4500, gpm per pump with two pumps operating in one loop. In this case, 4-000 the maximum suppression chamber water temperature and pressure are 177°F (as reported in Reference 7) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig. __This__is also_below_the_200°F_limit_imposed_by_Design_Criteria-BFN-50-7064A-(Ref.-5)-for-all-plant-transients-involving-SRV operations....

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 6).

BFN-UNIT 3

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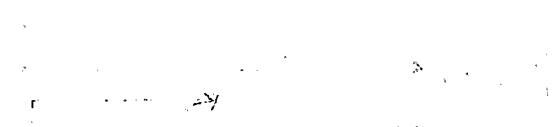
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Additionally, since the RHRSW pumps are shared between the three RHRSW System BFN units, the number of OPERABLE pumps required is also B 3.7.1 dependent on the number of units fueled. BASES (continued) LCO Four RHRSW subsystems are required to be OPERABLE to provide the required redundancy to ensure that the system functions In addition to the required number to remove post accident heat loads, assuming the worst case of OPERABLE subsystems, there single active failure occurs coincident with the loss of must be an adequate number of offsite power. pumps OPERABLE to provide cooling for the fueled non-accident An OPERABLE RHRSW subsystem consists of units. -The-reguired-number-of-OPERABLE-RHRSW-pumps-dependent-The number of required upon-the-number-of-units-fueled;-and--OPERABLE RHRSW pumps required is modified by a Note 2 b. ' An OPERABLE flow path capable of taking suction from which specifies that the number of the intake structure and transferring the water to the required RHRSW pumps may be required RHR heat exchangers at the assumed flow rate. reduced by one for each fueled unit <del>The LCO-is-modified-by-two-Notes.---Note-1-specifies-that-</del> that has been in MODE 4 or 5 for when-1-or-2-units-are-fueled;-there-must-be-at-least-oneover 24 hours. This Note OPERABLE-pump-per-RHRSW-subsystem.--Note-2-specifies-thatacknowledges the fact that decaye -when-3-units-are-fueled,-two-of-the-RHRSW-subsystems-mustheat removal requirements are -have-two-OPERABLE-RHRSW-pumps. 1000 substantially reduced for fueled with at least one OPERABLE units in Mode 4 or 5 for over 24 RHRSW pump in the flow path. APPLICABILITY In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling (LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System-Hot Shutdown"). The Applicability is therefore consistent with the requirements of these systems. In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports. -The-Actions-are-modified-by-a-Note-indicating-that-the-ACTIONS -applicable-Conditions-of-LCO-3-4-7-be-entered-and-Required--Actions-taken-if-the-inoperable-RHRSW-subsystem-results-in---LCO-3.0.6-and-ensures-the-proper-actions-are-taken-for-these--components.---(continued)

Amendment



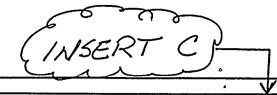
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RHRSW System B 3.7.1





BASES

(continued)

With one RHRSW subsystem or required pump inoperable, the inoperable RHRSW subsystem or required pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

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

A.1

Required Action B.1 requires verification that at least three OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems The Required Action is modified by a Note indicating that the required action is applicable only when two units are fueled. Required Action B.2 requires verification that at least four OPERABLE RHRSW pumps are associated with the two OPERABLE RHRSW subsystems. The Required Action is modified by a Note indicating that the required action is applicable only when three units are fueled.

Required Action B.3 requires that with two RHRSW subsystems inoperable, one inoperable RHRSW subsystem be restored to OPERABLE status within 7 days. With the unit(s) in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE RHRSW subsystems could result in loss of RHRSW function. The 7 day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE subsystems and the low probability of an event occurring requiring RHRSW during this period.

C.1

With three or more RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function.

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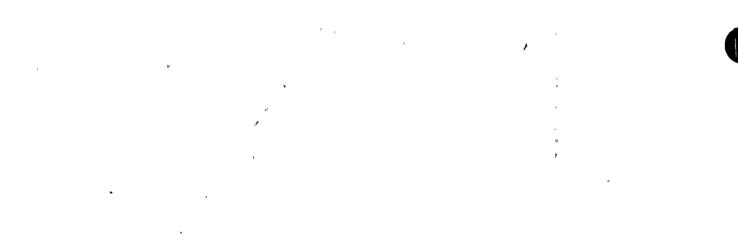
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## Insert C

## A.1 and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE. The Required Action is modified by two Notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition a single failure (loss of a 4kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps operable with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4kV shutdown boards to be OPERABLE if the other fueled unit has been in Mode 4 or 5 for over 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

If Required action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

## <u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

## <u>C.1</u>

With two required RHRSW pumps inoperable the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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## A.1 and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4kV shutdown boards are OPERABLE. The Required Action is modified by two Notes. Note indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition a single failure (loss of a kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of 6 OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps operable with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4kV shutdown boards to be OPERABLE if the other fueled unit has been in Mode 4 or 5 for over 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

If Required action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

## <u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

## '<u>C.1</u>

With two required RHRSW pumps inoperable the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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RHRSW System B 3.7.1



BASES ACTIONS 1.0 (continued) The requisite number of subsystems and pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions. D.1 and D.2 If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least SERT 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.



SURVEILLANCE REQUIREMENTS

## <u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position. This is acceptable because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

(continued)

Amendment

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With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 7 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

#### ۰<u>E.I</u>

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

## <u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within 8 hours. The 8 hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

The Required action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

#### G.1 and G.2

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.



# <u>D.1</u>

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BASES (continue	d)
REFERENCES	1. FSAR, Section 10.9.
•	2. FSAR, Chapter 5.
t	3. FSAR, Chapter 14.
	4. FSAR, Section 14.6.3.3.2.
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<i>ڊ</i> رڪ)	-6. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
< <u> </u>	-7: GE-NE-B13-01755-2, Revision 1, February 1996.

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Amendment

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#### ENCLOSURE 5

TENNESSEE VALLEY AUTHORITY BROWNS FERRY NUCLEAR PLANT (BFN) Units 1, 2, and 3

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PROPOSED IMPROVED TECHNICAL SPECIFICATION (TS) CHANGE TS-395 REVISED - ITS

### I. AFFECTED PAGE LIST

Unit 1 - Pages 3.7-1 through - 3, B3.7-1 through -8 Unit 2 - Pages 3.7-1 through - 3, B3.7-1 through -8 Unit 3 - Pages 3.7-1 through - 3, B3.7-1 through -8

### II. REVISED PAGES

See attached.

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# 3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1
The number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for ≥ 24 hours.
Four RHRSW subsystems shall be OPERABLE with the number of OPERABLE pumps as listed below:
1. 1 unit fueled - four OPERABLE RHRSW pumps.
2. 2 units fueled - six OPERABLE RHRSW pumps.
3. 3 units fueled - eight OPERABLE RHRSW pumps.

APPLICABILITY: MODES 1, 2, and 3.

BFN-UNIT 1

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ACTIONS	_		
CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One required RHRSW pump inoperable.	A.1	<pre>NOTES 1. Only applicable for the 2 units fueled condition.</pre>	•
		2. Only four RHRSW pumps powered from a separate 4 kV shutdown board are required to be OPERABLE if the other fueled unit has been in MODE 4 or 5 for $\geq 24$ hours.	
		Verify five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE.	Immediately
	<u>OR</u>		
	A.2	Restore required RHRSW pump to OPERABLE status.	30 days

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ACTIONS	(continued)			
	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	One RHRSW subsystems inoperable.	B.1	Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for RHR shutdown cooling made inoperable by the RHRSW system.	
	و		Restore RHRSW subsystem to OPERABLE status.	30 days
C.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status.	7 days
D.	Two RHRSW subsystems inoperable.	<b>D.1</b>	Enter applicable Conditions and Required Actions of LCO 3.4.7, for RHR shutdown cooling made inoperable by the RHRSW System.	у.
,			Restore one RHRSW subsystem to OPERABLE status.	7 days

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ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
E.	Three or more required RHRSW pumps inoperable.	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System. Restore one RHRSW subsystem to OPERABLE status.	8 hours
G.	Required Action and associated Completion Time not met.	G.1 <u>AND</u>	Be in MODE 3.	12 hours
	not met.	G.2	Be in MODE 4.	36 hours

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SURVEILLANCE REQUIREMENTS

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	SURVEILLANCE	FREQUENCY
SR 3.7.1.1	Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days ,

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# B 3.7 PLANT SYSTEMS

# B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

#### BASES

BACKGROUND The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System.

> The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit. As such, a subsystem consists of a loop with one or two OPERABLE pumps, a heat exchanger, a suction source, and associated valves, piping and instrumentation. The RHRSW System is designed with sufficient redundancy so that no single active component failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 (Ref. 1).

Cooling water is pumped by the RHRSW pumps from the Wheeler Reservoir through the tube side of the RHR heat exchangers, and discharged back to the Wheeler Reservoir.

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal clears, and is assumed to be manually started within 10 minutes after the LOCA.

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**BFN-UNIT 1** 

Amendment *R1

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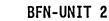
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### BASES (continued)

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

> The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the . associated RHR System is assumed to occur 10 minutes after a DBA. The RHRSW flow assumed in the analyses is 4000 gpm per pump with two pumps operating in one loop. In this case, the maximum suppression chamber water temperature and pressure are 177°F (as reported in Reference 6) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig.

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 5).



Amendment *R1

(continued)

# BASES (continued)

LCO Four RHRSW subsystems are required to be OPERABLE to provide the required redundancy to ensure that the system functions to remove post accident heat loads, assuming the worst case single active failure occurs coincident with the loss of offsite power. Additionally, since the RHRSW pumps are shared between the three BFN units, the number of OPERABLE pumps required is also dependent on the number of units fueled. An OPERABLE RHRSW subsystem consists of an OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate with at least one OPERABLE RHRSW pump in the flow path.

> In addition to the required number of OPERABLE subsystems, there must be an adequate number of pumps OPERABLE to provide cooling for the fueled non-accident units.

> The number of required OPERABLE RHRSW pumps required is modified by a Note which specifies that the number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for over 24 hours. This Note acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

APPLICABILITY

In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling (LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System-Hot Shutdown"). The Applicability is therefore consistent with the requirements of these systems.

In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports.

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BFN-UNIT 1

Amendment *R1

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### BASES (continued)

ACTIONS

# A.1 and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE. The Required Action is modified by two notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition, a single failure (loss of a 4 kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4 kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps OPERABLE with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required Action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4 kV shutdown boards to be OPERABLE if the other fueled unit has been in MODE 4 or 5 greater than 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for greater than 24 hours.

If Required Action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

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**BFN-UNIT 1** 

Amendment *R1

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ACTIONS (continued) <u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the lowprobability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>C.1</u>

With two required RHRSW pumps inoperable, the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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BFN-UNIT 1

Amendment *R1

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ACTIONS

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<u>D.1</u> With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The seven day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period. The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are

# <u>E.1</u>

taken for these components.

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

# <u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

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BFN-UNIT 1

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ACTIONS

### <u>F.1</u> (continued)

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>G.1 and G.2</u>

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.

SURVEILLANCE REQUIREMENTS

# <u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position, provided it can be realigned to its accident position. This is acceptable , because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

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BFN-UNIT 1

Amendment *R1

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SURVEILLANCE	<u>SR 3.7.1.1</u> (continued)
REQUIREMENTS	The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.
REFERENCES	1. FSAR, Section 10.9.
	2. FSAR, Chapter 5.
	3. FSAR, Chapter 14.
1	4. FSAR, Section 14.6.3.3.2.
•	5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.
	6. GE-NE-B13-01755-2, Revision 1, February 1996.

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# 3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1
The number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for ≥ 24 hours.
Four RHRSW subsystems shall be OPERABLE with the number of OPERABLE pumps as listed below:
1. 1 unit fueled - four OPERABLE RHRSW pumps.
2. 2 units fueled - six OPERABLE RHRSW pumps.
3. 3 units fueled - eight OPERABLE RHRSW pumps.

APPLICABILITY: MODES 1, 2, and 3.



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# ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
A. One required RHRSW pump inoperable.	A.1	<ol> <li>NOTES</li> <li>Only applicable for the 2 units fueled condition.</li> <li>Only four RHRSW pumps powered from a separate 4 kV shutdown board are required to be OPERABLE if the other fueled unit has been in MODE 4 or 5 for ≥ 24 hours.</li> </ol>	
		Verify five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE.	Immediately
•	<u>OR</u>	6	·
	.A.2	Restore required RHRSW pump to OPERABLE status.	30 days

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	CONDITION	i .	REQUIRED ACTION	COMPLETION TIME
Β.	One RHRSW subsystems inoperable.	B.1	NOTE Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for	
	," ,		RHR shutdown cooling made inoperable by the RHRSW system. Restore RHRSW subsystem to OPERABLE status.	30 days
С.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status.	7 days
D.	Two RHRSW subsystems inoperable.	D.1	NOTE Enter applicable Conditions and Required Actions of LCO 3.4.7, for RHR shutdown cooling made inoperable by the RHRSW System.  Restore one RHRSW	7 days
			subsystem to OPERABLE status.	7 days

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ACTIONS	(continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Ε.	Three or more required RHRSW pumps inoperable.	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System. Restore one RHRSW subsystem to OPERABLE status.	8 hours
G.	Required Action and associated Completion Time not met.	G.1 <u>AND</u> G.2	Be in MODE 3. Be in MODE 4.	12 hours 36 hours

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SURVEILLANCE REQUIREMENTS

	SURVEILLANCE			
SR 3.7.1.1	Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days		



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### B 3.7 PLANT SYSTEMS

### B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

### BASES

BACKGROUND The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System.

> The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit. As such, a subsystem consists of a loop with one or two OPERABLE pumps, a heat exchanger, a suction source, and associated valves, piping and instrumentation. The RHRSW System is designed with sufficient redundancy so that no single active component failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 (Ref. 1).

Cooling water is pumped by the RHRSW pumps from the Wheeler Reservoir through the tube side of the RHR heat exchangers, and discharged back to the Wheeler Reservoir.

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal clears, and is assumed to be manually started within 10 minutes after the LOCA.

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BFN-UNIT 2

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### BASES (continued)

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

> The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the associated RHR System is assumed to occur 10 minutes after a DBA. The RHRSW flow assumed in the analyses is 4000 gpm per pump with two pumps operating in one loop. In this case, the maximum suppression chamber water temperature and pressure are 177°F (as reported in Reference 6) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig.

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 5).

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BFN-UNIT 1

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Four RHRSW subsystems are required to be OPERABLE to provide the required redundancy to ensure that the system functions to remove post accident heat loads, assuming the worst case single active failure occurs coincident with the loss of offsite power. Additionally, since the RHRSW pumps are shared between the three BFN units, the number of OPERABLE pumps required is also dependent on the number of units fueled.

> An OPERABLE RHRSW subsystem consists of an OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate with at least one OPERABLE RHRSW pump in the flow path.

In addition to the required number of OPERABLE subsystems, there must be an adequate number of pumps OPERABLE to provide cooling for the fueled non-accident units.

The number of required OPERABLE RHRSW pumps required is modified by a Note which specifies that the number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for over 24 hours. This Note acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

APPLICABILITY

In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling (LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System-Hot Shutdown"). The Applicability is therefore consistent with the requirements of these systems.

In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports.

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### BASES (continued)

ACTIONS

### A.1 and A.2

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE. The Required Action is modified by two notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition, a single failure (loss of a 4 kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4 kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps OPERABLE with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required Action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4 kV shutdown boards to be OPERABLE if the other fueled unit has been in MODE 4 or 5 greater than 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for greater than 24 hours.

If Required Action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

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BFN-UNIT 2

ACTIONS

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B.1

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### C.1

With two required RHRSW pumps inoperable, the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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ACTIONS (continued) <u>D.1</u>

With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The seven day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>E.1</u>

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

### <u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

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ACTIONS

### <u>F.1</u> (continued)

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>G.1 and G.2</u>

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.

SURVEILLANCE REQUIREMENTS

### <u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position, provided it can be realigned to its accident position. This is acceptable because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

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SURVEILLANCE REQUIREMENTS	<u>SR 3.7.1.1</u> (continued) The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.				
REFERENCES	1. FSAR, Section 10.9.				
	2. FSAR, Chapter 5.				
	3. FSAR, Chapter 14.				
	4. FSAR, Section 14.6.3.3.2.				
	5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.				
	6. GE-NE-B13-01755-2, Revision 1, February 1996.				

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### 3.7 PLANT SYSTEMS

3.7.1 Residual Heat Removal Service Water (RHRSW) System

LCO 3.7.1
The number of required RHRSW pumps may be reduced by one for
each fueled unit that has been in MODE 4 or 5 for ≥ 24
hours.
Four RHRSW subsystems shall be OPERABLE with the number of
OPERABLE pumps as listed below:
1. 1 unit fueled - four OPERABLE RHRSW pumps.

2. 2 units fueled - six OPERABLE RHRSW pumps.

3. 3 units fueled - eight OPERABLE RHRSW pumps.

APPLICABILITY: MODES 1, 2, and 3.



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## ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME	
A. One required RHRSW pump inoperable.	A.1	<pre>I. Only applicable for the 2 units fueled condition.</pre>		
		2. Only four RHRSW pumps powered from a separate 4 kV shutdown board are required to be OPERABLE if the other fueled unit has been in MODE 4 or 5 for $\geq$ 24 hours.		
·	4	Verify five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE.	Immediately	
	<u>OR</u>			
	A.2	Restore required RHRSW pump to OPERABLE status.	30 days	

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	One RHRSW subsystems inoperable.	B.1	Enter applicable Conditions and Required Actions of LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling - Hot Shutdown," for RHR shutdown cooling made inoperable by the RHRSW system. Restore RHRSW subsystem to OPERABLE status.	30 days
С.	Two required RHRSW pumps inoperable.	C.1	Restore one inoperable RHRSW pump to OPERABLE status.	7 days
D.	Two RHRSW subsystems inoperable.	D.1	Enter applicable Conditions and Required Actions of LCO 3.4.7, for RHR shutdown cooling made inoperable by the RHRSW System. Restore one RHRSW subsystem to OPERABLE status.	7 days

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
Ε.	Three or more required RHRSW pumps inoperable.	E.1	Restore one RHRSW pump to OPERABLE status.	8 hours
F.	Three or more RHRSW subsystems inoperable.	F.1	Enter applicable Conditions and Required Actions of LCO 3.4.7 for RHR shutdown cooling made inoperable by the RHRSW System. Restore one RHRSW subsystem to OPERABLE status.	8 hours
G.	Required Action and associated Completion Time not met.	G.1 <u>AND</u>	Be in MODE 3.	12 hours
	· ·	G.2	Be in MODE 4.	36 hours

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SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.7.1.1	Verify each RHRSW manual and power operated valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position or can be aligned to the correct position.	31 days

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### B 3.7 PLANT SYSTEMS

### B 3.7.1 Residual Heat Removal Service Water (RHRSW) System

BASES

BACKGROUND The RHRSW System is designed to provide cooling water for the Residual Heat Removal (RHR) System heat exchangers, required for a safe reactor shutdown following a Design Basis Accident (DBA) or transient. The RHRSW System is operated whenever the RHR heat exchangers are required to operate in the shutdown cooling mode or in the suppression pool cooling or spray mode of the RHR System.

> The RHRSW System is common to the three BFN units and consists of four independent and redundant loops, each of which feeds one RHR heat exchanger in each unit. Each loop is made up of a header, two 4500 gpm pumps, a suction source, valves, piping, and associated instrumentation. One loop with one pump operating is capable of providing 50% of the required cooling capacity to maintain safe shutdown conditions for one unit. As such, a subsystem consists of a loop with one or two OPERABLE pumps, a heat exchanger, a suction source, and associated valves, piping and instrumentation. The RHRSW System is designed with sufficient redundancy so that no single active component failure can prevent it from achieving its design function. The RHRSW System is described in the FSAR, Section 10.9 (Ref. 1).

Cooling water is pumped by the RHRSW pumps from the Wheeler Reservoir through the tube side of the RHR heat exchangers, and discharged back to the Wheeler Reservoir.

The system is initiated manually from each of the three units control rooms. If operating during a loss of coolant accident (LOCA), the system is automatically tripped on degraded bus voltage to allow the diesel generators to automatically power only that equipment necessary to reflood the core. The system can be manually started any time the degraded bus voltage signal clears, and is assumed to be manually started within 10 minutes after the LOCA.



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### BASES (continued)

APPLICABLE SAFETY ANALYSES The RHRSW System removes heat from the suppression pool to limit the suppression pool temperature and primary containment pressure following a LOCA. This ensures that the primary containment can perform its function of limiting the release of radioactive materials to the environment following a LOCA. The ability of the RHRSW System to support long term cooling of the reactor or primary containment is discussed in the FSAR, Chapters 5 and 14 (Refs. 2 and 3, respectively). These analyses explicitly assume that the RHRSW System will provide adequate cooling support to the equipment required for safe shutdown. These analyses include the evaluation of the long term primary containment response after a design basis LOCA.

> The safety analyses for long term cooling were performed for various combinations of RHR System failures and considers the number of units fueled. With one unit fueled, the worst case single failure that would affect the performance of the RHRSW System is any failure that would disable two subsystems or pumps of the RHRSW System (e.g, the failure of an RHR Suppression Pool Cooling/Spray return line valve which effectively disables two RHRSW subsystems or pumps). With two and three units fueled, a worst case single failure could also include the loss of two RHRSW pumps caused by losing a 4 kV shutdown board since there are certain alignment configurations that allow two RHRSW pumps to be powered from the same 4 kV shutdown board. As discussed in the FSAR, Section 14.6.3.3.2 (Ref. 4) for these analyses, manual initiation of the OPERABLE RHRSW subsystems and the associated RHR System is assumed to occur 10 minutes after a DBA. The RHRSW flow assumed in the analyses is 4000 gpm per pump with two pumps operating in one loop. In this case, the maximum suppression chamber water temperature and pressure are 177°F (as reported in Reference 6) and 49.6 psig, respectively, well below the design temperature of 281°F and maximum allowable pressure of 62 psig.

The RHRSW System satisfies Criterion 3 of the NRC Policy Statement (Ref 5).

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### BASES (continued)

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Four RHRSW subsystems are required to be OPERABLE to provide the required redundancy to ensure that the system functions to remove post accident heat loads, assuming the worst case single active failure occurs coincident with the loss of offsite power. Additionally, since the RHRSW pumps are shared between the three BFN units, the number of OPERABLE pumps required is also dependent on the number of units fueled.

An OPERABLE RHRSW subsystem consists of an OPERABLE flow path capable of taking suction from the intake structure and transferring the water to the required RHR heat exchangers at the assumed flow rate with at least one OPERABLE RHRSW pump in the flow path.

In addition to the required number of OPERABLE subsystems, there must be an adequate number of pumps OPERABLE to provide cooling for the fueled non-accident units.

The number of required OPERABLE RHRSW pumps required is modified by a Note which specifies that the number of required RHRSW pumps may be reduced by one for each fueled unit that has been in MODE 4 or 5 for over 24 hours. This Note acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for over 24 hours.

APPLICABILITY In MODES 1, 2, and 3, the RHRSW System is required to be OPERABLE to support the OPERABILITY of the RHR System for primary containment cooling (LCO 3.6.2.3, "Residual Heat Removal (RHR) Suppression Pool Cooling," and LCO 3.6.2.4, "Residual Heat Removal (RHR) Suppression Pool Spray") and decay heat removal (LCO 3.4.7, "Residual Heat Removal (RHR) Shutdown Cooling System-Hot Shutdown"). The Applicability is therefore consistent with the requirements of these systems.

In MODES 4 and 5, the OPERABILITY requirements of the RHRSW System are determined by the systems it supports.

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### BASES (continued)

ACTIONS

### <u>A.1 and A.2</u>

Required Action A.1 requires immediate verification that five RHRSW pumps powered from separate 4 kV shutdown boards are OPERABLE. The Required Action is modified by two notes. Note 1 indicates that the required action is applicable only when two units are fueled. In the two unit fueled condition, a single failure (loss of a 4 kV shutdown board) could result in inadequate RHRSW pumps if two pumps are powered from the same power supply. This corresponds to the LCO requirement of six OPERABLE pumps when two units are fueled, which still provides the minimum required four RHRSW pumps with the worst case single failure. If five RHRSW pumps are powered from separate 4 kV shutdown boards, then no postulated single active failure could occur to prevent the RHRSW system from performing its design function. This is equivalent to any six RHRSW pumps OPERABLE with a maximum of two sets of two pumps allowed to be powered from the same power supply. Operation can continue indefinitely if Required Action A.1 is met.

Note 2 requires only four RHRSW pumps powered from separate 4 kV shutdown boards to be OPERABLE if the other fueled unit has been in MODE 4 or 5 greater than 24 hours. This acknowledges the fact that decay heat removal requirements are substantially reduced for fueled units in MODE 4 or 5 for greater than 24 hours.

If Required Action A.1 cannot be met, then Required Action A.2 must be complied with. With one RHRSW pump inoperable, the inoperable RHRSW pump must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

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ACTIONS (continued) <u>B.1</u>

With one RHRSW subsystem inoperable, the inoperable RHRSW subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The 30 day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>C.1</u>

With two required RHRSW pumps inoperable, the remaining RHRSW pumps are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure of the OPERABLE RHRSW pumps could result in a loss of RHRSW function. The seven day Completion Time is based on the redundant RHRSW capabilities afforded by the OPERABLE RHRSW pumps and the low probability of an event occurring during this period.

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ACTIONS (continued)

### <u>D.1</u>

With two RHRSW subsystems inoperable, the remaining OPERABLE RHRSW subsystems are adequate to perform the RHRSW heat removal function. However, the overall reliability is reduced because a single failure could result in reduced primary containment cooling capability. The seven day Completion Time is based on the availability of equipment in excess of normal redundancy requirements and the low probability of an event occurring requiring RHRSW during this period.

The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>E.1</u>

With three or more required RHRSW pumps inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of pumps must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

### <u>F.1</u>

With three or more required RHRSW subsystems inoperable, the RHRSW System is not capable of performing its intended function. The requisite number of subsystems must be restored to OPERABLE status within eight hours. The eight hour Completion Time is based on the Completion Times provided for the RHR suppression pool cooling and spray functions.

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**BFN-UNIT 3** 

ACTIONS

### <u>F.1</u> (continued)

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The Required Action is modified by a Note indicating that the applicable Conditions of LCO 3.4.7 be entered and Required Actions taken if the inoperable RHRSW subsystem results in inoperable RHR shutdown cooling. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

### <u>G.1 and G.2</u>

If the RHRSW subsystems cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which the LCO does not apply. 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.

SURVEILLANCE REQUIREMENTS

### <u>SR 3.7.1.1</u>

Verifying the correct alignment for each manual and power operated valve in each RHRSW subsystem flow path provides assurance that the proper flow paths will exist for RHRSW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. A valve is also allowed to be in the nonaccident position, and yet considered in the correct position. This is acceptable because the RHRSW System is a manually initiated system.

This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

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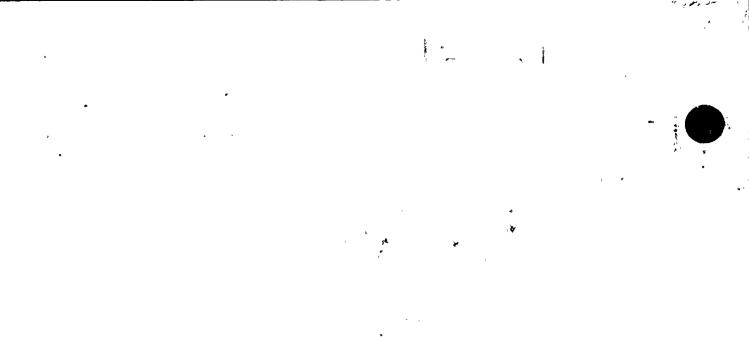
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SURVEILLANCE REQUIREMENTS	<u>SR 3.7.1.1</u> (continued) The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.				
REFERENCES	1. FSAR, Section 10.9.				
	2. FSAR, Chapter 5.				
	3. FSAR, Chapter 14.				
	4. FSAR, Section 14.6.3.3.2.				
	5. NRC No. 93-102, "Final Policy Statement on Technical Specification Improvements," July 23, 1993.				
-	6. GE-NE-B13-01755-2, Revision 1, February 1996.				

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