## PROPOSED CHANGE EXPLANATION FOR TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 4.5.3.2

## Description of Change

Change Technical Specification Surveillance Requirement 4.5.3.2 to read as follows:

4.5.3.2 All Safety Injection Pumps, except the OPERABLE pump allowed above, shall be demonstrated inoperable at least once per 12 hours whenever the temperature of one or more of the RCS Cold Legs is less than or equal to 312 F by the following:

- a. By verifying that the motor circuit breakers have been removed from their electrical power supply circuits or,
- b. For testing purposes, by verifying that the pump is in a recirculation flow path and that the manual discharge valve is closed.

#### **Reason for Change**

Considering the basis for this Surveillance Requirement, it is clear that it is too restrictive. By adopting the proposed change, no margin of safety would be reduced (i.e., the pump in the recirculation flow path would be incapable of injecting water into the RCS). This would not affect the basis for ensuring that a mass addition pressure transient could be relieved by the operation of a single POPS relief valve. This change would permit pump testing, in accordance with Technical Specification 4.0.5, while having another pump aligned to the RCS.

#### Significant Hazards Consideration Analysis

PDR

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There is no increase in the probability or consequences of an the accident scenario previously evaluated. This is due to the fact that only one pump will be aligned with the RCS.

This change does not create the possibility of a new or different type of accident. Since the surveillance requirement is based on a mass addition pressure transient with a single failure of a POPS valve resulting in brittle fracture of RCS components when more than one pump is injecting into the system; allowing one pump to be in a recirculation flow path does not create the possibility of a new accident.

There is no reduction in the margin of safety as set forth in the basis for the surveillance requirement.

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EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - Tava < 350°F

SURVEILLANCE REQUIREMENTS

4.5.3.1 The ECCS subsystem shall be demonstrated OPERABLE per applicable Surveillance Requirements of 4.5.2.

4.5.3.2 All safety injection pumps, except the OPERABLE pump allowed above, shall be demonstrated inoperable at least once per 12 hours whenever the temperature of one or more of the RCS cold legs is less than or equal to  $312^{\circ}$ F by the following:

a. By verifying that the motor circuit breakers have been removed from their electrical power supply circuits or,

b. For testing purposes, by verifying that the pump is in a recirculation flow path and that the manual discharge valve is closed.

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# EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS -  $T_{avg} < 350^{\circ}F$ 

### SURVEILLANCE REQUIREMENTS

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4.5.3.1 The ECCS subsystem shall be demonstrated OPERABLE per applicable Surveillance Requirements of 4.5.2.

4.5.3.2 All safety injection pumps, except the OPERABLE pump allowed above, shall be demonstrated inoperable at least once per 12 hours whenever the temperature of one or more of the RCS cold legs is less than or equal to 312°F by the following:

a. By verifying that the motor circuit breakers have been removed from their electrical power supply circuits or,

b. For testing purposes, by verifying that the pump is in a recirculation flow path and that the manual discharge valve is closed.

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