### SAFETY EVALUATION FOR CHANGES TO TECHNICAL SPECIFICATION TABLE 3.3-5

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### Background:

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Maintaining sceam generator water level automatically during periods of low power operation will reduce the control room operator attention required and provide better assurance of plant availability by reducing reactor trips. The present piping and valve arrangement in the feedwater system does not provide a means of automatic steam generator level control at low reactor power levels. Bypass valves will be installed around the main feedwater control valves as part of a system modification to provide this capability. . Closure time requirements associated with the feedwater control valves (FCV) should also be specified for the feedwater bypass valves and incorporated into the technical specifications. - The bogass values will were all closure actuation signals that the feedwater rector values presently recover.

References:

Technical Specification 3.3.2.1, Table 3.3-5.

(2) FSAR Sections 6.2.1.3.11, 10.4.7, and 15.4.2.1.

#### Bases:

The feedwater bypass valves are ASME III, Nuclear Class 3 valves which are designed to close within 5 seconds. The closure time of  $\leq$  5 seconds is consistent with the assumptions used in the accident analysis for FCV feedwater isolation in the event of a main steam line break inside containment. Therefore, this closure time should be specified for the feedwater bypass valves in the technical specifications.

### Conclusion:

The proposed changes to Technical Specification Table 3.3-5 do not involve an unreviewed safety question as defined by 10CFR50.59.

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### TABLE 3.3-5 (Continued)

### TABLE NOTATION

- \* Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps and RHR pumps.
- # Dierel generator starting and sequence loading delays not included. Offilite power available. Reconse time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps.
- ## Diesel generator starting and sequence loading delays included. Response time limit includes opening of valves to establish SI path and attainment of discharge pressure for centrifugal charging pumps.
- ### Verification shall include testing of all instrumentation, the isolation valves (MOV-3232A, 3232B, 3232C), and the control valves (FCV-478, 488, 498). The isolation valves must function within 30 seconds and the control valves, within 5 seconds.

## and bypass valves

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(and the bypass valves (FCV-479, 489, 499)