ATTACHMENT I

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 1

PROPOSED TECHNICAL SPECIFICATION CHANGES ON OPERABLE/OPERABILITY CLARIFICATION

JANUARY, 1981

DESCRIPTION OF CHANGES AND SAFETY EVALUATION SUMMARY

The proposed Technical Specification changes clarify the meaning and actions to be taken regarding the use of the terms operable/operability in the Definitions, Limiting Conditions for Operation, and Bases. The proposed changes are described below:

- (1) An expanded definition of the terms operable/operability has been added for clarification which is consistent with the NRC Staff's request.
- (2) As a result of several discussions with the NRC Staff, it was agreed that proposed changes to incorporate the intent of model Technical Specification 3.0.3 need not be addressed at this time. Based upon NNECO's reluctance to adopt model Technical Specification 3.0.3 without an exhaustive review of each specification to ensure that exceptions are included as appropriate, it was determined that the efforts involved did not exceed the benefits anticipated.
- (3) The intent of model Technical Specification 3.0.5 has been added to the Millstone Unit No. 1 Technical Specifications. Due to non-standard Technical Specifications, incorporation of the generic shutdown requirement stated in model Technical Specification 3.0.5 is not practical. Inclusion of this requirement would again require an exhaustive review of the current Technical Specifications to assure that appropriate exceptions to the generic shutdown requirement were taken. The current, individual Limiting Conditions of Operation (LCO's) alleady adequately require plant shutdown when specified safety systems are declared inoperable. Therefore, the proposed changes, in conjunction with the present Technical Specifications, meet the intent of model Technical Specification 3.0.5.
- (4) Changes made to the Bases in the Technical Specifications allow plant operation to be governed by the time limits of the action statement associated with the LCO for the normal or emergency power source, if a system is determined to be inoperable solely because of the inoperability of its normal or emergency power source. This is consistent with the NRC Staff's request and provides clarification of the proposed general LCO.

Pursuant to 10CFR50.59, these changes have been reviewed and it has been determined that they do not involve any unreviewed safety questions in that they do not increase the probability of occurrence or the consequences of an accident or malfunction of equipment, create a possibility for a different type of accident or malfunction, or reduce the margin of safety as defined in the Technical Specifications.

D. Immediate

Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.

E. Instrument 'alibration

An instrument alibration means the adjustment of an instrument signal output so that it corresponds, within acceptable range, accuracy and response time, to a known value(s) of the parameter which the instrument monitors. Calibration shall encompass the entire instrument including actuation, alarm or trip.

F. Instrument Functional Tests

An instrument functional test means the injection of a simulated signal into the instrument primary sensor to verify the proper instrument channel response, alarm, and/or initiating action.

G. Instrument Check

An instrument check is qualitative determination of operability by observation of behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.

H. Minimum Critical Power Ratio (MCPR)

Minimum Critical Power Ratio (MCPR) is the value of critical power ratio associated with the most limiting assembly in the reactor core. Critical Power Ratio (CPR) is the ratio of that power in a fuel assembly, which is calculated by application of the GEXL correlation to cause some point in the assembly to experience boiling transition, to the actual assembly operating power.

I. Mode

The reactor mode is that which is established by the mode-selector-switch.

J. Operable - Operability

A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

3.0 GENERAL

When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE. or likewise satisfy the requirements of this specification. If both conditions (1) and (2) are not satisfied, then the applicable action statements of the individual specifications must be taken. This specification is not applicable in Cold Shutdown or Refueling operational conditions.

4.0 GENERAL

Not applicable.

3.0 Bases:

The provisions of this specification permit the action statements associated with individual systems, subsystems, trains, components or devices to be consistent with the action statements of the associated electrical power source. It allows operation to be governed by the time limits of the action statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual action statements for each system, subsystem, train, component, or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source. Specification 3.0 is not applicable in Cold Shutdown or Refueling operational conditions, and thus the individual action statements for each applicable Limiting Condition for Operation must be adhered to.