

DECAY HEAT REMOVAL TECHNICAL SPECIFICATIONS

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 PDR ADDCK 05000289  
 PDR

| NRC Proposed<br>Tech Specs No. | Corresponding TMI-1<br>Tech Spec No(s).             | Comments  |
|--------------------------------|---|---|
| 3.4.1.1                        | 3.1.1.1.a   | Changed nuclear over power setpoints are automatically established by the RCP combination. (See FSAR section 7.1.2.2.3)   |
| 4.4.1.1                        | none needed   | This requirement is implied by Spec 3.1.1.1.a above and is a routine part of the operator shift and daily checks.   |
| 4.4.1.2                        | Table 4.1-1 (#10)                                   | The RPS is routinely checked per Table 4.1-1.   |
| 3.4.1.2                        | 3.1.1.1.b & c                                       | Reactor Coolant Pumps must be operated in order to maintain the RCS in a hot subcritical condition.   |
| 4.4.1.2.1 &<br>4.4.1.2.2       | none needed   | This specification is implied and the operability of RC Pumps and is a part of the routine operator shift and daily checks.   |
| 3.4.1.3                        | 3.1.1.2.a, 3.4.2<br>3.1.1.1.c, 3.3.1.4<br>and 3.3.2 | <p>The TMI-1 specifications require OTSG operability when greater than 250°F and require DHR or RCP operation during deboration. Plant procedures are being revised to address DHR system operability when greater than 250°F as well as during cold shutdown. With respect to operability of RC and DHR pumps/loops during cold shutdown, it should be noted that: (1) The RC pumps can only be operated under certain pressure conditions and are therefore not immediately available; (2) With the RC loops unavailable, (as above) per the NRC proposed specification, no DHR loop maintenance could be performed (without entering a refueling mode per spec. 3.9.8.2)*. The requirements of the action statements are, however, covered by TMI-1 specifications 3.4.2, 3.3.1.4 (considering the definition of operability), and 3.1.1.1.c. We agree that DHR system downtime should be minimized. (We do not believe that it is appropriate to place this philosophy in Technical Specifications.) This is based on the slow response of the RCS under cold shutdown conditions and the variety of methods (OTSG with natural circulation, HPI bleed and feed, and restoration of RC pumps, etc.) which can be made available for core cooling long before a core integrity concern could exist due to insufficient cooling or core uncoverly.</p> <p>* This involves a RV head lift which is believed to be a greater risk than the reduced DHR system availability.</p> |

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(Continued)

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| 4.4.1.3 | none needed         | See above discussion.  |
| 3.9.8.1 | 3.8.3 and 3.1.1.1.c |  |
| 4.9.8.1 | none needed         | Loss of DHR circulation would be readily recognized by the operator. |
| 3.9.8.2 | none needed         | See discussion in response to specification 3.4.1.3                  |