ATTACHMENT 1

Proposed Change to
LCO 4.4.1

"The last sentence on page 4.4-1 is replaced by the following paragraph during the period January 3, 1983, through January 13, 1983:

For Table 4.4-1, the reactor shall be shut down within 12 hours, except that to facilitate maintenance on the Plant Protective System (PPS) moisture monitors, the moisture monitor input trip functions to the Plant Protective System which cause scram, loop shutdown, circulator trip, and steam water dump may be disabled. During the time that the Plant Protective moisture monitor trips are disabled, an observer in direct communication with the Reactor Operator shall be positioned in the Control Room in the location of control boards I-03 and I-05. The observer shall continuously monitor the primary coolant moisture levels indicated by the analytical system moisture monitors (MM-9306 and MM-9307) and the primary coolant pressure indicators (PI-1108, PI-1109, and PI-1110), and shall alert the Reactor Operator to any indicated moisture or pressure change."

ATTACHMENT 2

Original Relief Request
P-83001

Per our telephone conversation of January 3, 1983, we are having problems with the plant protective system moisture monitors, and we are approaching the position that we will not be able to maintain the minimum number of operable moisture monitor channels required under the provisions of LCO 4.4.1. We anticipate that it will require seven days to effectively repair the moisture monitors. During this seven day period, we would propose to operate utilizing the intent of LCO 4.9.2 which permits taking moisture monitors out of service for moisture injection tests. Although we are not performing moisture injection tests, the consequences of taking the monitors out of service for repair are no different that those permitted by LCO 4.9.2.

In meeting the intent of LCO 4.9.2, we would place one dedicated person in the Control Room to continuously monitor the following parameters:

MM-9306 and 9307 - Analytical Moisture Monitors
PI-1108, 1109, 1110 - Reactor Pressure

In addition to constantly monitoring the above parameters, the dedicated individual will log the parameters every 30 minutes to serve as a record of operation.

Should any inadvertent or sudden moisture ingress occur, the dedicated individual will be in a position to immediately notify the Reactor Operator and initiate corrective action.

In addition, it should be noted that MM-9306 and 9307 are alarmed at a -45°F dewpoint (6.4 ppm moisture level in the primary coolant), and the reactor pressure alarm is set at "normal" plus 20 psi. The plant protective system low level monitors are normally set at 22°F dewpoint, and the high level monitors are set normally at 64°F.

MM-9306 and 9307 then provide an alarm at considerably lower levels than that at which the plant protective system would normally take automatic action, which would provide more than adequate time for operation action.

An increase in reactor pressure of 15 psi above normal or an increase in moisture levels in ME-9306 and 9307 to a 22°F dewpoint will be cause for manual reactor scram and preselected loop dump. These conditions are conservative with reference to plant protective system action in that reactor scram and preselect loop dump from high reactor pressure would occur at 50 psi above normal, and plant protective system moisture monitor scram and loop dump would occur at a 67°F dewpoint.

These compensatory actions, along with the plant protective system backup action on reactor pressure, more than adequately fulfill the intent of LCO 4.4.1, moisture monitors.

Temporary relief under the above provisions for seven days should provide adequate time to return the moisture monitors to service.