REFUELING OPERATIONS

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3/4.9.10 CONTROL ROD REMOVAL

SINGLE CONTROL ROD REMOVAL

## LIMITING CUNULILUN FUR OPERAPSON

3.9.10.1 One control rod and/or the associated control rod drive mechanism May be removed from the core and/or reactor pressure vessel provided that at least the following requirements are satisfied until a control rod and associated control rod drive mechanism are reinstalled and the control rod is fully inserted in the core.

- a. The reactor mode switch is OPERABLE and locked in the Shuldown or Refuel position per Specification 3.9.1.
- b. The source range monitors (SRM) are OPERABLE per Specification 3.9.2.

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- c. The SHUTDOWN MARGIN requirements of Epecification 9.1.1 are satisfied, except that the control rod selected to be removed;
  - May be assumed to be the highest worth control rod required to be assumed to be fully withdrawn by the SHUTDOWN MARGIN test, and
  - 2. Need not be assumed to be immovable or untrippable.

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- All other control rods in a five-by-five array contered on the control rod being removed are inserted and electrically or hydraulically disarmed.
- a. All other control ruds are inserted.

# APPLICABILITY: OPERATIONAL CONDITION 5.

#### ACTION:

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d removal With the requirements of the above specification not satisfied, suspend removal the core of the control rod and/or associated control rod drive mechanics from the core, the core and/or reactor pressure vessel and initiate action to satisfy the above require require-and/or reactor pressure vessel and initiate action to satisfy the above require ments. The provisions of Specification 3.0.3 are not applicable.

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#### REFUELING OPERATIONS

#### BASES

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# 3/4.9.6 REFUELING PLATFORM

The OPERABILITY requirements ensure that (1) the refueling platform will be used for handling centrel mode and fuel accomblies within the rearter pressure vessel, (2) each crane and hoist has sufficient load capacity for handling fuel assemblies and control rods, and (3) the core internals and pressure vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

STANDARD Tech Specs

# 3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE POOL

The restriction on movement of loads. In excess of the nominal weight of a fuel clament over irradiated fuel accambling ensures that no more than the contents of one fuel assembly will be rubtured in the event of a fuel handling arrident. This assumption is consistent with the activity release assumed in the accident analyses.

# 3/4.9.8 and 3/4.9.9 WATER LEVEL - REACTOR VESSEL and WATER LEVEL - SPENT FUEL STORAGE POOL

The restrictions on minimum water jovel ensure that sufficient water depth is available to remove (99)% of the assumed (10)% indine gap activity released from the rupture of an irrediated fuel assembly. This minimum water depth is consistent with the assumptions of the actident analysis.

#### 3/4.9.10 CONTROL ROD REMOVAL

These specifications ensure that maintenance or repair of control rods or control rod drives will be performed under conditions that limit the probability of inadvertent criticality. The requirements for simultaneous removal of more than one control rod are more stilligent since the GHUTDOWN MARCIN specification provides for the core to remain subcritical with only one control rod fully withdrawn.

## 3/4.9.11 RESIDUAL HEAT NEMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal 100; be OPLKAULL ensures that 1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel below 140°F as required during REPUELING, and 2) sufficient coolant circulation would be available through the reactor core to distribute and provent stratification of the poison in the event it becomes necessary to actuate the standby liquid control system.

The requirement to have two shutdown cooling mode loops OPERABLE when there is less than (23) feet of water above the reactor vessel flange ensures that a single failure of the operating loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and (23) feet of water above the reactor vessel flange, a large heat sink is available for core cooling. Thus, in the event a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

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- To	ACSevener	
FROM	JSRang	Consumers
DATE	May 17, 1979	Power Compeny
SUBJECT	BIG ROCK POINT PLANT -	eaufand
	TECH SPEC INTERPRETATION - REF TRIFCON WITH WRIDGEWAY	CORRESPONDENCE
cc	REDeWitt, P21-115A DEDeMoor, BRP	JSR 79-49
	RWHuston, P24-124 DPBlanchard, BRP	

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During removal of core internals, 3 questions were raised concerning the interpretation or intent of Tech Specs Secion 7.5.7. The 3 items evolved from the 2 statemento of 7.5.7 below.

- It shall be permissible to remove a control rod drive from the reactor when the reactor is in the shut down condition and the mode selector switch is locked in the "shutdown" position.
- The control rod drive that was removed shall without delay be replaced by a space control rod drive or the original control rod drive shall be reinstalled.

As a minimum 2 control rod drives will be removed coincidentally to allow inspection and testing of the J-weld area (Tech Spec items 1 & 2 reference only removal of 1 control rod drive).

Since considerable testing and probable repair activities will be conducted on F-2 housing the control rod drive cannot be replaced 'without delay' as referenced in Tech Specs item 2. In fact at least 1 control rod drive will be removed for several days or possibly weeks before replacement.

In addition subsequent to the removal of F-2 control rod drive, it will be necessary to remove the remaining control rod blades and support tube and channel assemblies which will require the mode selector switch to be removed from the 'shutdown' position as referenced in Tech Spece item 2.

When reviewing section 7.5.7 of the Tech Specs it becomes obvious that these conditions are required only when fuel is in the reactor vessel as a discussion is also included on the core shutdown margin of .3%  $\Delta K_{eff}/K_{eff}$  must be met, etc. However the Tech Specs do not read that with the fact of the reactil these conditions don't apply.

Be y discussion with ERidgoway on May 17, 1979, he agreed with our interpretation that these conditions only apply with fuel in the reactor vessel and that it would not be considered a vielation of our Toch Spoce to perform the activities described above with the fuel removed from the reactor vessel.