

ATTACHMENT IV
PROPOSED TECHNICAL SPECIFICATION CHANGES

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS

4.4.9.3.1 Each PORV shall be demonstrated OPERABLE by:

- a. Performance of an ANALOG CHANNEL OPERATIONAL TEST on the PORV actuation channel, but excluding valve operation, within 31 days prior to entering a condition in which the PORV is required OPERABLE and at least once per 31 days thereafter when the PORV is required OPERABLE;
- b. Performance of a CHANNEL CALIBRATION on the PORV actuation channel at least once per 18 months; and
- c. Verifying the PORV isolation valve is open at least once per 72 hours when the PORV is being used for overpressure protection.

4.4.9.3.2 Each RHR suction relief valve shall be demonstrated OPERABLE when the RHR suction relief valves are being used for cold overpressure protection as follows:

a. For RHR suction relief valve 8708B:

- ~~1) By verifying at least once per 31 days that RHR RCS Suction Isolation Valve (RRSIV) 8701B is open with power to the valve operator removed, and~~
- ~~2) By verifying at least once per 12 hours that RRSIV 8702B is open.~~

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b. For RHR suction relief valve 8708A:

- ~~1) By verifying at least once per 31 days that RRSIV 8702A is open with power to the valve operator removed, and~~
- ~~2) By verifying at least once per 12 hours that RRSIV 8701A is open.~~

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RHR RCS Suction Isolation Valves (RRSIVs) 8701B and 8702B are open.

and 8702A

c. Testing pursuant to Specification 4.0.5.

4.4.9.3.3 The RCS vent(s) shall be verified to be open at least once per 12 hours* when the vent(s) is being used for overpressure protection.

*Except when the vent pathway is provided with a valve which is locked, sealed, or otherwise secured in the open position, then verify these valves open at least once per 31 days.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

- a. At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

<u>Valve Number</u>	<u>Valve Function</u>	<u>Valve Position</u>
BN-HV-8813	Safety Injection to RWST Isolation Vlv	Open
EM-HV-8802A(B)	SI Pump Discharge Hot Leg Iso Vlvs	Closed
EM-HV-8835	Safety Injection Cold Leg Iso Valve	Open
EJ-HV-8840	RHR/SI Hot Leg Recirc Iso Valve	Closed
EJ-HV-8809A	RHR to Accum Inj Loops 1 & 2 Iso Vlv	Open
EJ-HV-8809B	RHR to Accum Inj Loops 3 & 4 Iso Vlv	Open

- b. At least once per 31 days by:
- 1) Verifying that the ECCS piping is full of water by venting the ECCS pump casings and accessible discharge piping high points, and
 - 2) Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. By a visual inspection which verifies that no loose debris (rags, trash, clothing, etc.) is present in the containment which could be transported to the containment sump and cause restriction of the pump suctions during LOCA conditions. This visual inspection shall be performed:
- 1) For all accessible areas of the containment prior to establishing CONTAINMENT INTEGRITY, and
 - 2) Of the areas affected within containment at the completion of each containment entry when CONTAINMENT INTEGRITY is established.
- d. At least once per 18 months by:
- 1) Verifying automatic ~~isolation and~~ interlock action of the RHR System from the Reactor Coolant System by ensuring that:
 - a) ~~With a simulated or actual Reactor Coolant System pressure signal greater than or equal to 425 psig, the interlocks prevent the valves from being opened, and~~
 - b) ~~With a simulated or actual Reactor Coolant System pressure signal less than or equal to 750 psig the interlocks will cause the valves to automatically close.~~

REACTOR COOLANT SYSTEM

BASES

PRESSURE/TEMPERATURE LIMITS (Continued)

Following the generation of pressure-temperature curves for both the steady-state and finite heatup rate situations, the final limit curves are produced as follows. A composite curve is constructed based on a point-by-point comparison of the steady-state and finite heatup rate data. At any given temperature, the allowable pressure is taken to be the lesser of the three values taken from the curves under consideration.

The use of the composite curve is necessary to set conservative heatup limitations because it is possible for conditions to exist such that over the course of the heatup ramp the controlling condition switches from the inside to the outside and the pressure limit must at all times be based on analysis of the most critical criterion.

Although the pressurizer operates in temperature ranges above those for which there is reason for concern of nonductile failure, operating limits are provided to assure compatibility of operation with the fatigue analysis performed in accordance with the ASME Code requirements.

The OPERABILITY of two PORVs, or two RHR suction relief valves, or an RCS vent opening of at least 2 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to 368°F. Either PORV or either RHR suction relief valve has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either: (1) the start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 50°F above the RCS cold leg temperatures, or (2) the start of a centrifugal charging pump and its injection into a water solid RCS.

~~RHR RCS suction isolation valves 8701A and B are interlocked with an "A" train wide range pressure transmitter and valves 8702A and B are interlocked with a "B" train wide range pressure transmitter. Removing power from valves 8701B and 8702A, prevents a single failure from inadvertently isolating both RHR suction relief valves while maintaining RHR isolation capability for both RHR flow paths.~~

In addition to opening RCS vents to meet the requirement of Specification 3.4.9.3c., it is acceptable to remove a pressurizer Code safety valve, open a PORV block valve and remove power from the valve operator in conjunction with disassembly of a PORV and removal of its internals, or otherwise open the RCS.