

Attached Marked-Up
Pages of the Technical Specifications

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | FREQUENCY |
|---|--|
| SR 3.3.1.1.16 Verify Turbine Stop Valve Closure and Turbine Control Valve Fast Closure Trip Oil Pressure-Low Functions are not bypassed when THERMAL POWER is $\geq 40\%$ RTP. | 18 months |
| <div data-bbox="211 634 446 670">SR 3.3.1.1.17</div> <div data-bbox="487 634 1153 670">-----NOTES-----</div> <div data-bbox="487 663 1057 702">1. Neutron detectors are excluded.</div> <div data-bbox="107 712 437 915"> <div data-bbox="107 712 437 915" style="border: 1px solid black; border-radius: 10px; padding: 5px;"> 2. For Functions 3, 4, and 5 in Table 3.3.1.1-1, the channel sensors are excluded. </div> </div> <div data-bbox="459 727 1161 829"> 3. The STAGGERED TEST BASIS Frequency for each Function shall be determined on a per channel basis. </div> <div data-bbox="487 889 1110 957">Verify the RPS RESPONSE TIME is within limits.</div> | <div data-bbox="1197 889 1433 989">18 months on a STAGGERED TEST BASIS</div> |

SURVEILLANCE REQUIREMENTS

NOTES

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c, 3.f, 3.g, and 3.h; and (b) for up to 6 hours for Functions other than 3.c, 3.f, 3.g, and 3.h, provided the associated Function or the redundant Function maintains ECCS initiation capability.

| SURVEILLANCE | | FREQUENCY |
|--------------|--|-------------------------------------|
| SR 3.3.5.1.1 | Perform CHANNEL CHECK. | 12 hours |
| SR 3.3.5.1.2 | Perform CHANNEL FUNCTIONAL TEST. | 92 days |
| SR 3.3.5.1.3 | Calibrate the analog trip module. | 92 days |
| SR 3.3.5.1.4 | Perform CHANNEL CALIBRATION. | 18 months |
| SR 3.3.5.1.5 | Perform LOGIC SYSTEM FUNCTIONAL TEST. | 18 months |
| SR 3.3.5.1.6 | <p>-----NOTE----- The STAGGERED TEST BASIS Frequency shall be determined on a per channel basis for each ECCS trip systems. -----</p> <p>Verify the ECCS RESPONSE TIME is within limits.</p> | 18 months on a STAGGERED TEST BASIS |

Table 3.3.5.1-1 (page 1 of 5)
 Emergency Core Cooling System Instrumentation

| FUNCTION | APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS | REQUIRED CHANNELS PER FUNCTION | CONDITIONS REFERENCED FROM REQUIRED ACTION A.1 | SURVEILLANCE REQUIREMENTS | ALLOWABLE VALUE |
|---|--|--------------------------------------|--|--|--|
| 1. Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems | | | | | |
| a. Reactor Vessel Water Level - Low Low Low, Level 1 | 1,2,3, 4(a),5(a) | 2(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≥ -147.7 inches |
| b. Drywell Pressure - High | 1,2,3 | 2(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≤ 1.88 psig |
| c. LPCI Pump A Start - Time Delay Logic Card | 1,2,3, 4(a),5(a) | 1 | C | SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 4.5 seconds and ≤ 5.5 seconds |
| d. Reactor Vessel Pressure - Low (Injection Permissive) | 1,2,3 4(a),5(a) | 4 4 | C B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 452 psig and ≤ 478 psig ≥ 452 psig and ≤ 478 psig |
| e. LPCS Pump Discharge Flow - Low (Bypass) | 1,2,3, 4(a),5(a) | 1 | E | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 750 gpm |
| f. LPCI Pump A Discharge Flow - Low (Bypass) | 1,2,3, 4(a),5(a) | 1 | E | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 900 gpm |
| g. Manual Initiation | 1,2,3, 4(a),5(a) | 1 | C | SR 3.3.5.1.5 | NA |

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator.

Table 3.3.5.1-1 (page 2 of 5)
Emergency Core Cooling System Instrumentation

| FUNCTION | APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS | REQUIRED CHANNELS PER FUNCTION | CONDITIONS REFERENCED FROM REQUIRED ACTION A.1 | SURVEILLANCE REQUIREMENTS | ALLOWABLE VALUE |
|--|--|--------------------------------------|--|--|--|
| 2. LPCI B and LPCI C Subsystems | | | | | |
| a. Reactor Vessel Water Level - Low Low Low, Level 1 | 1,2,3, 4(a),5(a) | 2(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≥ -147.7 inches |
| b. Drywell Pressure - High | 1,2,3 | 2(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≤ 1.88 psig |
| c. LPCI Pump B Start - Time Delay Logic Card | 1,2,3, 4(a),5(a) | 1 | C | SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 4.5 seconds and ≤ 5.5 seconds |
| d. Reactor Vessel Pressure - Low (Injection Permissive) | 1,2,3 4(a),5(a) | 4 4 | C B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 452 psig and ≤ 478 psig ≥ 452 psig and ≤ 478 psig |
| e. LPCI Pump B and LPCI Pump C Discharge Flow - Low (Bypass) | 1,2,3, 4(a),5(a) | 1 per pump | E | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 900 gpm |
| f. Manual Initiation | 1,2,3, 4(a),5(a) | 1 | C | SR 3.3.5.1.5 | NA |

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator.

Table 3.3.5.1-1 (page 3 of 5)
Emergency Core Cooling System Instrumentation

| FUNCTION | APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS | REQUIRED CHANNELS PER FUNCTION | CONDITIONS REFERENCED FROM REQUIRED ACTION A.1 | SURVEILLANCE REQUIREMENTS | ALLOWABLE VALUE |
|--|--|--------------------------------------|--|---|---------------------|
| 3. High Pressure Core Spray (HPCS) System | | | | | |
| a. Reactor Vessel Water Level - Low Low, Level 2 | 1,2,3, 4(a),5(a) | 4(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≥ -47.7 inches |
| b. Drywell Pressure - High | 1,2,3 | 4(b) | B | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 SR 3.3.5.1.6 | ≤ 1.88 psig |
| c. Reactor Vessel Water Level - High, Level B | 1,2,3, 4(a),5(a) | 2 | C | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≤ 54.2 inches |
| d. RCIC Storage Tank Level - Low | 1,2,3, 4(c),5(c) | 2 | D | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 0 inches |
| e. Suppression Pool Water Level - High | 1,2,3 | 2 | D | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≤ 12 inches |
| f. HPCS Pump Discharge Pressure - High (Bypass) | 1,2,3, 4(a),5(a) | 1 | E | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 120 psig |
| g. HPCS System Flow Rate - Low (Bypass) | 1,2,3, 4(a),5(a) | 1 | E | SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.4 SR 3.3.5.1.5 | ≥ 500 gpm |
| h. Manual Initiation | 1,2,3, 4(a),5(a) | 1 | C | SR 3.3.5.1.5 | NA |

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator.

(c) When HPCS is OPERABLE for compliance with LCO 3.5.2, "ECCS - Shutdown," and aligned to the RCIC storage tank while tank water level is not within the limits of SR 3.5.2.2.

Primary Containment and Drywell Isolation Instrumentation
3.3.6.1

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment and Drywell Isolation Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains isolation capability.

| SURVEILLANCE | | FREQUENCY |
|--------------|--|-------------------------------------|
| SR 3.3.6.1.1 | Perform CHANNEL CHECK. | 12 hours |
| SR 3.3.6.1.2 | Perform CHANNEL FUNCTIONAL TEST. | 92 days |
| SR 3.3.6.1.3 | Calibrate the analog trip module. | 92 days |
| SR 3.3.6.1.4 | Perform CHANNEL CALIBRATION. | 92 days |
| SR 3.3.6.1.5 | Perform CHANNEL CALIBRATION. | 18 months |
| SR 3.3.6.1.6 | Perform LOGIC SYSTEM FUNCTIONAL TEST. | 18 months |
| SR 3.3.6.1.7 | <div style="border: 1px solid black; border-radius: 15px; padding: 5px; display: inline-block; margin-bottom: 10px;"> 1. Channel sensors are excluded. </div> <div style="margin-left: 20px;"> <p>-----NOTES-----</p> <p>2. The STAGGERED TEST BASIS Frequency for each Function shall be determined on a per channel basis.</p> <p>Verify the ISOLATION SYSTEM RESPONSE TIME for the main steam isolation valves is within limits.</p> </div> | 18 months on a STAGGERED TEST BASIS |

SURVEILLANCE REQUIREMENTS (continued)

| SURVEILLANCE | FREQUENCY |
|---|--|
| SR 3.5.1.5 -----NOTE----- Vessel injection/spray may be excluded. ----- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal. | 18 months |
| SR 3.5.1.6 -----NOTE----- Valve actuation may be excluded. ----- Verify the ADS actuates on an actual or simulated automatic initiation signal. | 18 months |
| SR 3.5.1.7 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----- Verify each ADS valve opens when manually actuated. | 18 months on a STAGGERED TEST BASIS for each valve solenoid |

SR 3.5.1.8

-----NOTE-----
 ECCS activation instrumentation is
 excluded.

 Verify the ECCS RESPONSE TIME
 for each ECCS injection/spray
 subsystem is within limits.

18 months

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Bases

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(continued)

SR 3.3.1.1.16

This SR ensures that scrams initiated from the Turbine Stop Valve Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions will not be inadvertently bypassed when THERMAL POWER is $\geq 40\%$ RTP. This involves calibration of the bypass channels. Adequate margins for the instrument setpoint methodology are incorporated into the actual setpoint. Because main turbine bypass flow can affect this setpoint nonconservatively (THERMAL POWER is derived from turbine first stage pressure), the main turbine bypass valves must remain closed at THERMAL POWER $\geq 40\%$ RTP to ensure that the calibration remains valid.

If any bypass channel setpoint is nonconservative (i.e., the Functions are bypassed at $\geq 40\%$ RTP, either due to open main turbine bypass valve(s) or other reasons), then the affected Turbine Stop Valve Closure and Turbine Control Valve Fast Closure, Trip Oil Pressure—Low Functions are considered inoperable. Alternatively, the bypass channel can be placed in the conservative condition (nonbypass). If placed in the nonbypass condition, this SR is met and the channel is considered OPERABLE.

The Frequency of 18 months is based on engineering judgment and reliability of the components.

SR 3.3.1.1.17

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. The RPS RESPONSE TIME acceptance criteria are included in plant Surveillance procedures.

As noted, neutron detectors are excluded from RPS RESPONSE TIME testing because the principles of detector operation virtually ensure an instantaneous response time.

RPS RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. Note³ of SR 3.3.1.1.17 requires STAGGERED TEST BASIS Frequency for each Function to be determined separately based on the four channels as specified in Table 3.3.1.1-1. This Frequency is based on the logic interrelationships of the various channels required to produce an RPS scram signal.

(continued)

In addition, for Functions 3, 4, and 5, the associated sensors are not required to be response time tested. For these Functions, response time testing for the remaining channel components, including the ATMs, is required. This allowance is supported by Reference 10.

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REQUIREMENTS

SR 3.3.1.1.17 (continued)

Therefore, staggered testing results in response time verification of these devices every 18 months. This frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious time degradation, but not channel failure, are infrequent.

REFERENCES

1. USAR, Section 7.2.
2. USAR, Section 5.2.2.
3. USAR, Section 6.3.3.
4. USAR, Chapter 15.
5. USAR, Section 15.4.1.2.
6. NEDO-23842, "Continuous Control Rod Withdrawal in the Startup Range," April 18, 1978.
7. USAR, Section 15.4.9.
8. Letter, P. Check (NRC) to G. Lainas (NRC), "BWR Scram Discharge System Safety Evaluation," December 1, 1980, as attached to NRC Generic Letter dated December 9, 1980.
9. NEDO-30851-P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.

10. NEDO-32291-A, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

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SURVEILLANCE
REQUIREMENTSSR 3.3.5.1.5 (continued)

Frequency. The frequencies recommended by the manufacturer are based on mean time between failure analysis for the components in the associated circuits.

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for unplanned transients if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

SR 3.3.5.1.6

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. Response time testing acceptance criteria are included in Reference 5.

ECCS RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. This Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent.

This SR is modified by a Note that requires the STAGGERED TEST BASIS Frequency for each Function in each trip system to be determined separately based on the number of redundant channels for that Function specified on Table 3.3.5.1-1. This Frequency is based on the logic interrelationships of the various channels required to produce an ECCS initiation signal.

REFERENCES

1. USAR, Section 5.2.2.
2. USAR, Section 6.3.
3. USAR, Chapter 15.

(continued)

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REFERENCES
(continued)

4. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Insirumentation, Part 2," December 1988.

5. USAR, Section 6.3, Table 6.3-8.
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Primary Containment and Drywell Isolation Instrumentation
B 3.3.6.1

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SURVEILLANCE
REQUIREMENTSSR 3.3.6.1.4 and SR 3.3.6.1.5 (continued)

adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.6.1.4 and SR 3.3.6.1.6 is based on the assumption of the magnitude of equipment drift in the setpoint analysis.

SR 3.3.6.1.6

The LOGIC SYSTEM FUNCTIONAL TEST demonstrates the OPERABILITY of the required isolation logic for a specific channel. The system functional testing performed on PCIVs in LCO 3.6.1.3 and on drywell isolation valves in LCO 3.6.5.3 overlaps this Surveillance to provide complete testing of the assumed safety function. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

The Self Test System may be utilized to perform this testing for those components that it is designed to monitor. Those portions of the solid-state logic not monitored by the Self Test System may be tested at the frequency recommended by the manufacturer, rather than at the specified 18-month Frequency. The frequencies recommended by the manufacturer are based on mean time between failure analysis for the components in the associated circuits.

SR 3.3.6.1.7

This SR ensures that the individual channel response times are less than or equal to the maximum values assumed in the accident analysis. Testing is performed only on channels where the assumed response time does not correspond to the diesel generator (DG) start time. For channels assumed to respond within the DG start time, sufficient margin exists in the 12 second start time when compared to the typical channel response time (milliseconds) so as to assure adequate response without a specific measurement test. The

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Primary Containment and Drywell Isolation Instrumentation
B 3.3.6.1

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As noted, the associated sensors are not required to be response time tested. Response time testing for the remaining channel components including the ATMs, is required. This is supported by Reference 7.

SR 3.3.6.1.7 (continued)

instrument response times must be added to the MSIV closure times to obtain the ISOLATION SYSTEM RESPONSE TIME. ISOLATION SYSTEM RESPONSE TIME acceptance criteria are included in applicable plant procedures.

² The Note to SR 3.3.6.1.7 requires the STAGGERED TEST BASIS Frequency for each Function to be determined separately based on the number of channels as specified on Table 3.3.6.1-1. This Frequency is based on the logic interrelationships of the various channels required to produce an isolation signal.

ISOLATION SYSTEM RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS. This Frequency is consistent with the typical industry refueling cycle and is based upon plant operating experience that shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent.

REFERENCES

1. USAR, Section 6.2.
2. USAR, Chapter 15.
3. NEDO-31466, "Technical Specification Screening Criteria Application and Risk Assessment," November 1987.
4. USAR, Section 9.3.5.
5. NEDC-31677-P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," June 1989.
6. NEDC-30851-P-A, Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," March 1989.

7. NEDO-32291-A, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.

BASES

SURVEILLANCE
REQUIREMENTSSR 3.5.1.7 (continued)

performing this test because valve OPERABILITY and the setpoints for overpressure protection are verified, per ASME requirements, prior to valve installation. Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. SR 3.5.1.6 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The Frequency of 18 months on a STAGGERED TEST BASIS ensures that both solenoids for each ADS valve are alternately tested. The Frequency is based on the need to perform this Surveillance under the conditions that apply just prior to or during a startup from a plant outage and the potential for unplanned transients. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

INSERT
B13

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REFERENCES

1. USAR, Section 6.3.2.2.3.
2. USAR, Section 6.3.2.2.4.
3. USAR, Section 6.3.2.2.1.
4. USAR, Section 6.3.2.2.2.
5. USAR, Section 15.2.8.
6. USAR, Section 15.6.4.
7. USAR, Section 15.6.5.
8. 10 CFR 50, Appendix K.
9. USAR, Section 6.3.3.
10. 10 CFR 50.46.
11. USAR, Section 6.3.3.3.

(continued)

INSERT B13

SR 3.5.1.8

This SR ensures that the ECCS RESPONSE TIMES are within limits for each of the ECCS injection and spray subsystems. This SR is modified by a note which identifies that the associated ECCS actuation instrumentation is not required to be response time tested. Response time testing of the remaining subsystem components is required. This is supported by Reference 15. Response time testing acceptance criteria are included in Reference 13.

ECCS RESPONSE TIME tests are conducted every 18 months. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES

REFERENCES
(continued)

12. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCO's for ECCS Components," December 1, 1975.
13. USAR, Table 6.3-2.
14. USAR, Section 7.3.1.1.1.4.

15. NEDO-32291-A, "System Analyses for Elimination of Selected Response Time Testing Requirements," January 1994.