TO NLS-84-074

RESPONSE TO GENERIC LETTER NO. 83-36 (NUREG-0737 TECHNICAL SPECIFICATIONS)

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2

REFERENCE NO. 84TSB01

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.5.3 The accident monitoring instrumentation channels shown in Table 3.3.5.3-1 shall be OPEKABLE.

APPLICABILITY: As shown in Table 3.3.5.3-1.

ACTION:

- a. With one or more accident monitoring instrumentation channels inoperable, take the ACTION required by Table 3.3.5.3-1.
- b. The provisions of Specification 3.0.4 are rea applicable.

SURVEILLANCE REQUIREMENTS

4.3.5.3 Each of the above required accident monitoring instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.5.3-1.

ACCIDENT MONITORING INSTRUMENTATION

INST	TRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBE OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
1.	Reactor Vessel Pressure (B21-PI-R004A,B; C32-LPR-R608; and C32-PT-N005A,B)	2 .	1	1, 2	82
2.	Reactor Vessel Water Level (B21-LITS-N026A,B; B21-LR-R615; B21-LI-R604A,B; B21-LT-N037; and B21-LTM-N037-1)	. 2	1	1, 2	82
3.	Suppression Chamber Water Level (CAC-LT-2601; CAC-LI-2601-1) (CAC-LT-2602; CAC-LR-2602)	2	1	1, 2	82
4.	Suppression Chamber Water Temperature (CAC-TR-1258-14, 21; and C91-P602)	2	1	1, 2	82
5.	Suppression Chamber Atmosphere Temperature (CAC-TR-1258-17 thru 20; and C91-P602)	2	1	1, 2	82
6.	Drywell Pressure (CAC-PI-4176; CAC-PT-4176; CAC-PR-1257-1; and CAC-PT-4175)	2	1	1, 2	82
7.	Drywell Temperature (CAC-TR-1258-1 thru 13, 22, 23, 24 and C91-P602	2	1	1, 2	82
8.	Drywell Radiation (CAC-AR-1260; CAC-AQH-1260-1,2,3; CAC-AR-1261; CAC-AQH-1261-1,2,3; CAC-AR-1262; CAC-AQH-1262-1,2,3)	2	2	1, 2, 3	81

INS	TRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
9.	Drywell Oxygen Concentration (CAC-AT-4409-37; CAC-AI-4409-40; CAC-X-XY-4348-2; CAC-X-XY-4349-2; CAC-AR-4409-41)	2 ^(a)	1 ^(a)	1, 2	82
	(CAC-AT-4410-37; CAC-AI-4410-40; CAC-X-XY-4362-2; CAC-X-XY-4363-2; CAC-AR-4410-41)				
10.	Drywell Hydrogen Concentration Analyzer and Monito (CAC-AT-4409-38; CAC-AI-4409-32; CAC-X-XY-4348-1; CAC-X-XY-4349-1; CAC-AR-4409-42)	r 2(a)	1 ^(a)	1, 2	82
	(CAC-AT-4410-38; CAC-AI-4410-32; CAC-X-XY-4362-1; CAC-X-XY-4363-1; CAC-AR-4410-42)				
11.	Drywell Area Radiation Monitors (D22-RM-4195; D22-RI-4195) (D22-RM-4196; D22-RI-4196) (D22-RM-4197; D22-RI-4197) (D22-RM-4198; D22-RI-4198)	2	2	1, 2	81
12.	Safety/Relief Valve Position Indication	2/valve	1/valve	1, 2	82
	 a. Primary - Sonic (B21-FY-4157 thru 4167) b. Secondary - Temp. (B21-TR-R614, points 1-11) 				

INSTRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
13. Turbine Building Ventilation Monitor# (D12-RE-4561; D12-RE-4562; D12-RR-4548-2; D12-RR-4548-3)	1	1	1, 2, 3	81
14. Off-gas Stack Ventilation Monitor# (D12-RE-4573; D12-RE-4574; D12-RR-4599-2; D12-RR-4599-3)	1	1	1, 2, 3	81

[#] High range noble gas monitors

⁽a) An OPERABLE instrument channel shall consist of the AT instrument and either the AI instrument or the XY-XY-AR instruments.

Table 3.3.5.3-1 (Continued)

ACCIDENT MONITORING INSTRUMENTATION ACTION STATEMENTS

ACTION 81 -

With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours, and:

- 1) either restore at least the minimum number of operable channel(s) to OPERABLE status within 7 days of the event, or
- 2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

ACTION 82 -

- a. With the number of OPERABLE channels one less than the required number of channels shown in Table 3.3.5.3-1, restore the inoperable channel to OPERABLE status within 31 days or be in at least HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE channels less than the minimum channels OPERABLE requirements of Table 3.3.5.3-1, restore at least the minimum number of operable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

TABLE 4.3.5.3-1

INSTRUMENT AND INSTRUMENT NUMBER	CHANNEL	CALIBRATION
1. Reactor Vessel Pressure (B21-PI-R004A,B; C32-LPR-R608; and C32-PT-N005A,B)	М	R
<pre>2. Reactor Vessel Water Level (B21-LITS-N026A,B; B21-LR-R615; B21-LI-R604A,B; B21-LT-N037; and B21-LTM-N037-1)</pre>	М	R
3. Suppression Chamber Water Level (CAC-LT-2601; CAC-LI-2601-1) (CAC-LT-2602; CAC-LR-2602)	М	R
4. Suppression Chamber Water Temperature (CAC-TR-1258-14, 21; and C91-P602)	М	R
5. Suppression Chamber Atmosphere Temperature (CAC-TR-1258-17 thru 20; and C91-P602)	м	R
CAC-PI-4176; CAC-PT-4176; CAC-PR-1257-1; and CAC-PT-4175)	м	R
CAC-TR-1258-1 thru 13, 22, 23, 24; and C91-P602)	М	R
- Drywell Radiation (CAC-AR-1260; CAC-AQH-1260-1,2,3; CAC-AR-1261; CAC-AQH-1261-1,2,3; CAC-AR-1262; CAC-AQH-1262-1,2,3)	м	. R
O. Drywell Oxygen Concentration (CAC-AT-4409-37; CAC-AI-4409-40; CAC-X-XY-4348-2; CAC-X-XY-4349-2; CAC-AR-4409-41) (CAC-AT-4410-37; CAC-AI-4410-40; CAC-X-XY-4362-2; CAC-X-XY-4363-2; CAC-AR-4410-41)	М	R

INSTRUMENT AND INSTRUMENT NUMBER	CHANNEL CHECK	CALIBRATION
10. Drywell Hydrogen Concentration Analyzer and Monitor (CAC-AT-4409-38; CAC-AI-4409-32; CAC-X-XY-4348-1; CAC-X-XY-4349-1; CAC-AR-4409-42)	М	R
(CAC-AT-4410-38; CAC-AI-4410-32; CAC-X-XY-4362-1; CAC-X-XY-4363-1; CAC-AR-4410-4?)		
11. Drywell Area Radiation Monitor (D22-RM-4195; D22-RI-4195) (D22-RM-4196; D22-RI-4196) (D22-RM-4197; D22-RI-4197) (D22-RM-4198; D22-RI-4198)	м	R*
12. Safety Relief Valve Position Indication a. Primary - Sonic (B21-FY-4157 thru 4167) b. Secondary - Temp. (B21-TR-R614, points 1-11)	M M	R R
13. Turbine Building Ventilation Monitor# (D12-RE-4561; D12-RE-4562; D12-RR-4548-2; D12-RR-4548-3)	м	R
14. Off-gas Stack Ventilation Monitor# (D12-RE-4573; D12-RE-4574; D12-RR-4599-2; D12-RR-4599-3)	М	R

^{*} CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10R/hr and a one point calibration check of the detector below 10R/hr with an installed or portable gamma source.

[#] High range noble gas monitors.

CHLORINE DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.5.5 A chloring detection system shall be OPERABLE with the alarm setpoint adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm.

APPLICABILITY: OPERATIONAL CONDITIONS 1*, 2*, and 3*.

ACTION:

- a. With the chlorine detection system inoperable, restore the inoperable detection system to OPERABLE status within 3 hours or be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.5.5 The chlorine detection system (X-AT-2977) shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.

*With chlorine within the Exclusion Area.

BASES

MONITORING INSTRUMENTATION (Continued)

3/4.3.5.2 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown conitoring instrumentation ensures that sufficient capability is available to permit statdown and maintenance of HOT SHUTDOWN of the facility from locations ourside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of CFR 50.

3/4.3.5.3 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short Term Recommendations."

5/4.3.5.4 SOURCE RANGE MONITORS

The source range monitors provide the operator with information on the status of the neutron level in the core at very low power levels during start-up. At these power levels, reactivity additions should not be made without this flux level information available to the operator. When the intermediate range monitors are on scale adequate information is available without the SRMs and they can be retracted.

3/4.3.5.5 CHLORINE DETECTION SYSTEM

The OPERABILITY of the chlorine detection systems ensures that an accidental chlorine release will be detected promptly and the necessary protective actions will be automatically initiated to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilation system will automatically isolate the control room and initiate operation in the recirculation mode to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95 "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release."

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ACCIDENT MONITORING INSTRUMENTATION

LIMITING ONDITION FOR OPERATION

3.3.5.3 The accident monitoring instrumentation channels shown in Table 3.3.5.3-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3.5.3-1.

ACTION:

- a. With one or more accident monitoring instrumentation channels inoperable, take the ACTION required by Table 3.3.5.3-1.
- b. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS.

4.3.5.3 Each of the above required accident monitoring instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.5.3-1.

TABLE 3.3.5.3-1
ACCIDENT MONITORING INSTRUMENTATION

INS	TRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
2.	Reactor Vessel Pressure (B21-PI-R004A,B; C32-LPE-R608; and C32-PT-N005A,B)	2	1	1, 2	82
2.	Reactor Vessel Water Level (B21-LITS-N026A,B; B21-LR-R615; B21-LI-R604A,B; B21-LT-N037; and B21-LTM-N037-1)	2	1	1, 2	82
3.	Suppression Chamber Water Level (CAC-LT-2601; CAC-LI-2601-1) (CAC-LT-2602; CAC-LR-2602)	2	1	1, 2	82
4.	Suppression Chamber Water Temperature (CAC-TR-1258-14, 21; and C91-P602)	2	1.	1, 2	82
5.	Suppression Chamber Atmosphere Temperature (CAC-TR-1258-17 thru 20; and C91-P602)	2	1	1, 2	82
6.	Drywell Pressure (CAC-PI-4176; CAC-PT-4176; CAC-PR-1257-1; and CAC-PT-4175)	2	1	1, 2	82
7.	Drywell Temperature (CAC-TR-1258-1 thru 13, 22, 23, 24 and C91-P602	2 .	1	1, 2	82
8.	Drywell Radiation (CAC-AR-1260; CAC-AQH-1260-1,2,3; CAC-AR-1261; CAC-AQH-1261-1,2,3; CAC-AR-1262; CAC-AQH-1262-1,2,3)	2	2	1, 2, 3	81

INSTRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION
9. Drywell Oxygen Concentration (CAC-AT-4409-37; CAC-AI-4409-40; CAC-X-XY-4348-2; CAC-X-XY-4349-2; CAC-AR-4409-41)	2(a)	1 ^(a)	1, 2	82
(CAC-AT-4410-37; CAC-AI-4410-40; CAC-X-XY-4362-2; CAC-X-XY-4363-2; CAC-AR-4410-41)				
10. Drywell Hydrogen Concentration Analyzer and Monis (CAC-AT-4409-38; CAC-AI-4409-32; CAC-X-XY-4348-1; CAC-X-XY-4349-1; CAC-AR-4409-42)	tor 2(a)	₁ (a)	1, 2	82
(CAC-AT-4410-38; CAC-AI-4410-32; CAC-X-XY-4362-1; CAC-X-XY-4363-1; CAC-AR-4410-42)				
11. Drywell Area Radiation Monitors (D22-RM-4195; D22-RI-4195) (D22-RM-4196; D22-RI-4196) (D22-RM-4197; D22-RI-4197) (D22-RM-4198; D22-RI-4198)	2	2	1, 2	81
 12. Safety/Relief Valve Position Indication a. Primary - Sonic (B21-FY-4157 thru 4167) b. Secondary - Temp. (B21-TR-R614, points 1-11) 	2/valve	l/valve	1, 2	82

INSTRUMENT AND INSTRUMENT NUMBER	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	APPLICABLE OPERATIONAL CONDITIONS	ACTION	
13. Turbine Building Ventilation Monitor# (D12-RE-4561; D12-RE-4562; D12-RR-4548-2; D12-RR-4548-3)	1	1	1, 2, 3	81	
14. Off-gas Stack Ventilation Monitor# (D12-RE-4573; D12-RE-4574; D12-RR-4599-2: D12-RR-4599-3)	1	1	1, 2, 3	81	

[#] High range noble gas monitors.

⁽a) An OPERABLE instrument channel shall consist of the AT instrument and either the AI instrument or the XY-XY-AR instruments.

Table 3.3.5.3-1 (Continued)

ACCIDENT MONITORING INSTRUMENTATION ACTION STATEMENTS

ACTION 81 -

With the number of OPERABLE channels less than required by the minimum channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours, and:

- 1) either restore at least the minimum number of operable channel(s) to OPERABLE status within 7 days of the event, or
- 2) prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status.

ACTION 82 -

- a. With the number of OPERABLE channels one less than the required number of channels shown in Table 3.3.5.3-1, restore the inoperable channel to OPERABLE status within 31 days or be in at least HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE channels less than the minimum channels OPERABLE requirements of Table 3.3.5.3-1, restore at least the minimum number of operable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

TABLE 4.3.5.3-1

INST	TRUMENT AND INSTRUMENT NUMBER	CHANNEL	CALIBRATION
1.	Reactor Vessel Pressure (B21-PI-R004A,B; C32-LPR-R608; and C32-PT-N005A,B)	М	R
2.	Reactor Vessel Water Level (B21-LITS-N026A,B; B21-LR-R615; B21-LI-R604A,B; B21-LT-N037; and B21-LTM-N037-1)	М	R
3.	Suppression Chamber Water Level (CAC-LT-2601; CAC-LI-2601-1) (CAC-LT-2602; CAC-LR-2602)	М	R
4.	Suppression Chamber Water Temperature (CAC-TR-1258-14, 21; and C91-P602)	М	R
5.	Suppression Chamber Atmosphere Temperature (CAC-TR-1258-17 thru 20; and C91-P602)	М	R
6.	Drywell Pressure (CAC-PI-4176; CAC-PR-1257-1; and CAC-PT-4175)	М	R
7.	Drywell Temperature (CAC-TR-1258-1 thru 13, 22, 23, 24; and C91-P602)	М	R
8.	Drywell Radiation (CAC-AR-1260; CAC-AQH-1260-1,2,3; CAC-AR-1261; CAC-AQH-1261-1,2,3; CAC-AR-1262; CAC-AQH-1262-1,2,3)	М	R
9. 1	Drywell Oxygen Concentration (CAC-AT-4409-37; CAC-AI-4409-40; CAC-X-XY-4348-2; CAC-X-XY-4349-2; CAC-AR-4409-41) (CAC-AT-4410-37; CAC-AI-4410-40; CAC-X-XY-4362-2; CAC-X-XY-4363-2; CAC-AR-4410-41)	М	R

INSTRUMENT AND INSTRUMENT NUMBER	CHANNEL CHECK	CALIBRATION
10. Drywell Hydrogen Concentration Analyzer and Monitor (CAC-AT-4409-38; CAC-AI-4409-32; CAC-X-XY-4348-1; CAC-X-XY-4349-1; CAC-AR-4409-42) (CAC-AT-4410-38; CAC-AI-4410-32; CAC-X-XY-4362-1; CAC-X-XY-4363-1; CAC-AR-4410-42)	н	R
11. Drywell Area Radiation Monitor (D22-RM-4195; D22-RI-4195) (D22-RM-4196; D22-RI-4196) (D22-RM-4197; D22-RI-4197) (D22-RM-4198; D22-RI-4198)	М	R*
 Safety Relief Valve Position Indication a. Primary - Sonic (B21-FY-4157 thru 4167) b. Secondary - Temp. (B21-TR-R614, points 1-11) 	M M	R R
13. Turbine Building Ventilation Monitor# (D12-RE-4561; D12-RE-4562; D12-RR-4548-2; D12-RR-4548-3)	М	R
14. Off-gas Stack Ventilation Monitor# (D12-RE-4573; D12-RE-4574; D12-RR-4599-2; D12-RR-4599-3)	М	R

^{*} CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10R/hr and a one point calibration check of the detector below 10R/hr with an installed or portable gamma source.

[#] High range noble gas monitors.

CHLORINE DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.5.5 A chlorine detection system shall be OPERABLE with the alarm setpoint adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm.

APPLICABILITY: OPERATIONAL CONDITIONS 1*, 2*, and 3*.

ACTION:

- a. With the chlorine detection system inoperable, restore the inoperable detection system to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.5.5 The chlorine detection system (X-AT-2977) shall be demonstrated OPERABLE by performance of a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per 18 months.

*With chlorine within the Exclusion Area.

BASES

MONITORING INSTRUMENTATION (Continued)

3/4.3.5.2 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost, and is consistent with General Design Criterion 19 of CFR 50.

3/4.3.5.3 ACCIDENT MONITOPING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975, and NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

3/4.3.5.4 SOURCE PANGE MONITORS

The source range monitors provide the operator with information on the status of the neutron level in the core at very low power levels during start-up. At these power levels, reactivity additions should not be made without this flux level information available to the operator. When the intermediate range monitors are on scale, adequate information is available without the SRMs and they can be retracted.

3/4.3.5.5 CHLORINE DETECTION SYSTEM

The OPERABILITY of the chlorine detection systems ensures that an accidental chlorine release will be detected promptly and the necessary protective actions will be automatically initiated to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilation system will automatically isolate the control room and initiate operation in the recirculation mode to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release."