

March 26, 1990

MEMORANDUM FOR: Gus C. Lainas, Assistant Director for Region II Reactors
Division of Reactor Projects I/II
Office of Nuclear Reactor Regulation

FROM: Luis A. Reyes, Director, Division of Reactor Projects

SUBJECT: TECHNICAL ASSISTANCE REQUEST: INTERPRETATION
OF TECHNICAL SPECIFICATION 3.4.1.4.2 AND THE
VOLUNTARY ENTRY INTO ACTION STATEMENTS CONTAINING
NO ALLOWABLE OUTAGE TIMES OR THE WORD IMMEDIATELY

Region II has become aware of a condition where a licensee has been voluntarily entering action statements that contain no Allowable Outage Times (AOT). An example of the typical specification used in this approach is enclosed. The licensee would define the word immediately in the action statement to mean within 15 minutes. Having defined immediately as to having some time duration, the licensee would then interpret the action statement to mean that the valves could be opened for periods of time up to fifteen minutes and thereby not violate the LCO and the action statement.

Region II believes that the existence of the action statement does not allow the opening of the valves for any period of time and does not allow for voluntary entry into the action statement due to the nonexistence of an AOT or an exception to the LCO or action statement.

Region II requests that NRR review the policy of entering action statements that do not contain AOTs and the meaning of the word 'immediately' as contained in Technical Specifications. Specifically, we request you to provide an interpretation of the enclosed specification as to whether the valves could be opened for short durations of time, and has there been guidance given in TS background information that would define the word immediate.

If additional information is required, contact P. Kellogg at FTS 841-5542.

(ORIGINAL SIGNED BY C. W. HEHL FOR)
Luis A. Reyes

Enclosure:
Technical Specification 3.4.1.4.2

bcc w/encl:

A. Gibson, DRS
T. Peebles, DRS
A. Herdt, DRP

*FOR PREVIOUS CONCURRENCE - SEE ATTACHED COPY
RII:DRS RII:DRS RII:DRS

*PKellogg
03/ /90

*TAPeebles
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*AGibson
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RII:DRS

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TAPeebles
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COLD SHUTDOWN - LOOPS NOT FILLED

LIMITING CONDITION FOR OPERATION

4.4.1.4.2 Two residual heat removal (RHR) trains shall be OPERABLE* and at least one RHR train shall be in operation.** Reactor Makeup Water Storage Tank (RMWST) discharge valves (1208-U4-175, 1208-U4-176, 1208-U4-177 and 1208-U4-183) shall be closed and secured in position.

APPLICABILITY: MODE 5 with reactor coolant loops not filled.

ACTION:

- a. With less than the above required RHR trains OPERABLE, immediately initiate corrective action to return the required RHR trains to OPERABLE status as soon as possible.
- b. With no RHR train in operation, suspend all operations involving a reduction in boron concentration of the Reactor Coolant System and immediately initiate corrective action to return the required RHR train to operation.
- c. With the Reactor Makeup Water Storage Tank (RMWST) discharge valves (1208-U4-175, 1208-U4-176, 1208-U4-177, and 1208-U4-183) not closed and secured in position, immediately close and secure in position the RMWST discharge valves.

SURVEILLANCE REQUIREMENTS

4.4.1.4.2.1 At least one RHR train shall be determined to be in operation and circulating reactor coolant at least once per 12 hours.

4.4.1.4.2.2 Valves 1208-U4-175, 1208-U4-176, 1208-U4-177, and 1208-U4-183 shall be verified closed and secured in position by mechanical stops at least once per 31 days.

*One RHR train may be inoperable for up to 2 hours for surveillance testing provided the other RHR train is OPERABLE and in operation.

**The RHR pump may be deenergized for up to 1 hour provided: (1) no operations are permitted that would cause dilution of the Reactor Coolant System boron concentration, and (2) core outlet temperature is maintained at least 10°F below saturation temperature.