ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME	
B. Two or more control rod scram accumulators inoperable with reactor steam dome pressure ≥ 900 psig.	B.1	Restore charging water header pressure to ≥ 955 psig. 940	20 minutes from discovery of Condition B concurrent with charging water header pressure < 355 psig 940	
	AND			
	B.2.1	Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance.		
		Declare the associated control rod scram time "slow."	1 hour	
	OR			
	B.2.2	Declare the associated control rod inoperable.	1 hour	

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Control Rod Scram Accumulators 3.1.5

ACTIONS (continued)

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CONDITION		REQUIRED ACTION		COMPLETION TIME	
c.	One or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig.	C.1	Verify all control rods associated with inoperable accumulators are fully inserted.	Immediately upon discovery of charging water header pressure < 955 psig 940	
		AND			
		C.2	Declare the associated control rod inoperable.	1 hour	
D.	Required Action B.1 or C.1 and associated Completion Time not met.	D.1	Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods.		
			Place the reactor mode switch in the shutdown position.	Immediately	

CHOVETHI	ANCE	REQUIREMENTS
SURVEILL	ANCE	REQUIREMENTS

	FREQUENCY	
SR 3.1.5.1	Verify each control rod scram accumulator pressure is ≥ 955 psig. 940	7 days

Control Rod OPERABILITY-Refueling 3.9.5

- 3.9 REFUELING OPERATIONS
- 3.9.5 Control Rod OPERABILITY-Refueling

LCO 3.9.5 Each withdrawn control rod shall be OPERABLE.

APPLICABILITY: MODE 5.

ACTIONS

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CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One or more withdrawn control rods inoperable.	A.1	Initiate action to fully insert inoperable withdrawn control rods.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE					
SR	3.9.5.1	Not required to be performed until 7 days after the control rod is withdrawn. Insert each withdrawn control rod at least	7 days			
		one notch.	7 days			
SR	3.9.5.2	Verify each withdrawn control rod scram accumulator pressure is ≥ 955 psig. 940	7 days			

SDM Test-Refueling 3.10.8

SURVEILLANCE REQUIREMENTS (continued)

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		SURVEILLANCE	FREQUENCY
SR	3.10.8.5	Verify each withdrawn control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position
			AND
			Prior to satisfying LCO 3.10.8.c requirement after work on control rod or CRD System that could affect coupling
SR	3.10.8.6	Vérify CRD charging water header pressure ≥ 955 psig. 940	7 days

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A.1 and A.2 (continued)

control rod is declared inoperable (Required Action A.2) and LCO 3.1.3 is entered. This would result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function, in accordance with ACTIONS of LCO 3.1.3.

The allowed Completion Time of 8 hours is reasonable, based on the large number of control rods available to provide the scram function and the ability of the affected control rod to scram only with reactor pressure at high reactor pressures.

B.1, B.2.1, and B.2.2

With two or more control rod scram accumulators inoperable and reactor steam dome pressure \geq 900 psig, adequate pressure must be supplied to the charging water header. With inadequate charging water pressure, all of the accumulators could become inoperable, resulting in a potentially severe degradation of the scram performance. Therefore, within 20 minutes from discovery of charging water header pressure < 955 psig concurrent with Condition B, adequate charging water header pressure must be restored. The allowed Completion Time of 20 minutes is reasonable, to place a CRD pump into service to restore the charging water header pressure, if required. This Completion Time is based on the ability of the reactor pressure alone to fully insert all control rods.

The control rod may be declared "slow," since the control rod will still scram using only reactor pressure, but may not satisfy the times in Table 3.1.4-1. Required Action B.2.1 is modified by a Note indicating that declaring the control rod "slow" only applies if the associated control scram time is within the limits of Table 3.1.4-1 during the last scram time test. Otherwise, the control rod would already be considered "slow" and the further degradation of scram performance with an inoperable accumulator could result in excessive scram times. In this event, the associated control rod is declared inoperable (Required Action B.2.2) and LCO 3.1.3 entered. This would

(continued)

ACTIONS B.1, B.2.1, and B.2.2 (continued)

BASES

result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function in accordance with ACTIONS of LCO 3.1.2.

The allowed Completion Time of 1 hour is reasonable, based on the ability of only the reactor pressure to scram the control rods and the low probability of a DBA or transient occurring while the affected accumulators are inoperable.

C.1 and C.2

With one or more control rod scram accumulators inoperable and the reactor steam dome pressure < 900 psig, the pressure supplied to the charging water header must be adequate to ensure that accumulators remain charged. With the reactor steam dome pressure < 900 psig, the function of the accumulators in providing the scram force becomes much more important since the scram function could become severely degraded during a depressurization event or at low reactor pressures. Therefore, immediately upon discovery of charging water header pressure < 955 psig, concurrent with Condition C, all control rods associated with inoperable accumulators must be verified to be fully inserted. Withdrawn control rods with inoperable accumulators may fail to scram under these low pressure conditions. The associated control rods must also be declared inoperable within 1 hour. The allowed Completion Time of 1 hour is reasonable for Required Action C.2, considering the low probability of a DBA or transient occurring during the time that the accumulator is inoperable.

D.1

The reactor mode switch must be immediately placed in the shutdown position if either Required Action and associated Completion Time associated with the loss of the CRD charging pump (Required Actions B.1 and C.1) cannot be met. This ensures that all insertable control rods are inserted and that the reactor is in a condition that does not require the

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ACTIONS	<u>D.1</u> (continued)			
	active function (i.e., scram) of the control rods. This Required Action is modified by a Note stating that the action is not applicable if all control rods associated with the inoperable scram accumulators are fully inserted, since the function of the control rods has been performed.			
SURVEILLANCE	<u>SR 3.1.5.1</u>			
REQUIREMENTS	SR 3.1.5.1 requires that the accumulator pressure be checked every 7 days to ensure adequate accumulator pressure exists to provide sufficient scram force. The primary indicator of accumulator OPERABILITY is the accumulator pressure. A minimum accumulator pressure is specified, below which the capability of the accumulator to perform its intended function becomes degraded and the accumulator is considered			
940	inoperable. The minimum accumulator pressure of 955 psig is well below the expected pressure of approximately 1450 psig (Ref. 1). Declaring the accumulator inoperable when the minimum pressure is not maintained ensures that significant degradation in scram times does not occur. The 7 day Frequency has been shown to be acceptable through operating experience and takes into account indications available in the control room.			
REFERENCES	1. UFSAR, Section 3.4.5.3 and Figure 3.4.10.			
	2. UFSAR, Appendix K, Section VI.			
	3. UFSAR, Chapter 14.			

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B 3.9 REFUELING OPERATIONS

B 3.9.5 Control Rod OPERABILITY-Refueling

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BACKGROUND	Control rods are components of the Control Rod Drive (CRD) System, the primary reactivity control system for the reactor. In conjunction with the Reactor Protection System, the CRD System provides the means for the reliable control of reactivity changes during refueling operation. In addition, the control rods provide the capability to maintain the reactor subcritical under all conditions and to limit the potential amount and rate of reactivity increase caused by a malfunction in the CRD System.
	UFSAR design criteria require that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The CRD System is the system capable of maintaining the reactor subcritical in cold conditions.
APPLICABLE SAFETY ANALYSES	Prevention and mitigation of prompt reactivity excursions during refueling are provided by refueling interlocks (LCO 3.9.1 and LCO 3.9.2), the SDM (LCO 3.1.1), the intermediate range monitor neutron flux scram (LCO 3.3.1.1), and the control rod block instrumentation (LCO 3.3.2.1).
	The safety analyses for the control rod withdrawal error during refueling (Ref. 2) and the fuel assembly insertion error (Ref. 3) evaluate the consequences of control rod withdrawal during refueling and also fuel assembly insertion with a control rod withdrawn. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment. Control rod scram provides protection should a prompt reactivity excursion occur.
	Control rod OPERABILITY during refueling satisfies Criterion 3 of the NRC Policy Statement.
LCO	Each withdrawn control rod must be OPERABLE. The withdrawn control rod is considered OPERABLE if the scram accumulator pressure is \geq 955 psig and the control rod is capable of 940 (continued)

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LCO (continued)	being automatically inserted upon receipt of a scram signal. Inserted control rods have already completed their reactivity control function, and therefore, are not required to be OPERABLE.
APPLICABILITY	During MODE 5, withdrawn control rods must be OPERABLE to ensure that in a scram the control rods will insert and provide the required negative reactivity to maintain the reactor subcritical.
	For MODES 1 and 2, control rod requirements are found in LCO 3.1.2, "Reactivity Anomalies," LCO 3.1.3, "Control Rod OPERABILITY," LCO 3.1.4, "Control Rod Scram Times," and LCO 3.1.5, "Control Rod Scram Accumulators." During MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod OPERABILITY during these conditions.
ACTIONS	A.1
	With one or more withdrawn control rods inoperable, action must be immediately initiated to fully insert the inoperable control rod(s). Inserting the control rod(s) ensures the shutdown and scram capabilities are not adversely affected. Actions must continue until the inoperable control rod(s) is fully inserted.
SURVEILLANCE	SR 3.9.5.1 and SR 3.9.5.2
REQUIREMENTS	During MODE 5, the OPERABILITY of control rods is primarily required to ensure a withdrawn control rod will automatically insert if a signal requiring a reactor shutdown occurs. Because no explicit analysis exists for automatic shutdown during refueling, the shutdown function is satisfied if the withdrawn control rod is capable of automatic insertion and the associated CRD scram accumulator pressure is \geq 955 psig.
	The 7 day Frequency takes into consideration equipment reliability, procedural controls over the scram accumulators, and control room alarms and indicating lights that indicate low accumulator charge pressures.
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SR 3.10.8.6 SURVEILLANCE

REQUIREMENTS (continued)

CRD charging water header pressure verification is performed to ensure the motive force is available to scram the control rods in the event of a scram signal. Since the reactor is depressurized in MODE 5, there is insufficient reactor pressure to scram the control rods. Verification of charging water header pressure ensures that if a scram were required, capability for rapid control rod insertion would exist. The minimum pressure of 955 psig is well below the 940 expected pressure of approximately 1450 psig while still ensuring sufficient pressure for rapid control rod insertion. The 7 day Frequency has been shown to be acceptable through operating experience and takes into account indications available in the control room.

REFERENCES

- NEDE-24011-P-A-US, General Electric Standard 1. Application for Reactor Fuel, Supplement for United States, February 1991.
- Letter from T. Pickens (BWROG) to G.C. Lainas, NRC, 2. "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," August 15, 1986.

Control Rod Scram Accumulators 3.1.5

ACTIONS (continued)

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Β.	Two or more control rod scram accumulators inoperable with reactor steam dome pressure ≥ 900 psig.	B.1	Restore charging water header pressure to ≥ 955 psig. 940	20 minutes from discovery of Condition B concurrent with charging water header pressure < 955 psig 940	
		B.2.1	Only applicable if the associated control rod scram time was within the limits of Table 3.1.4-1 during the last scram time Surveillance.		
			Declare the associated control rod scram time "slow."	1 hour	
		OR			
		B.2.2	Declare the associated control rod inoperable.	1 hour	

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ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
c.	One or more control rod scram accumulators inoperable with reactor steam dome pressure < 900 psig.	C.1	Verify all control rods associated with inoperable accumulators are fully inserted.	Immediately upon discovery of charging water header pressure < 955 psig 940
		C.2	Declare the associated control rod inoperable.	1 hour
D.	Required Action B.1 or C.1 and associated Completion Time not met.	D.1	Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods.	
			Place the reactor mode switch in the shutdown position.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.1.5.1	Verify each control rod scram accumulator pressure is \geq 955 psig. 940	7 days

Control Rod OPERABILITY-Refueling 3.9.5

- 3.9 REFUELING OPERATIONS
- 3.9.5 Control Rod OPERABILITY-Refueling

LCO 3.9.5 Each withdrawn control rod shall be OPERABLE.

APPLICABILITY: MODE 5.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME	
A. One or more withdrawn control rods inoperable.	A.1	Initiate action to fully insert inoperable withdrawn control rods.	Immediately	

SURVEILLANCE REQUIREMENTS

SURVEILLANCE			FREQUENC
SR	3.9.5.1	Not required to be performed until 7 days after the control rod is withdrawn. Insert each withdrawn control rod at least one notch.	7 days
SR	3.9.5.2	Verify each withdrawn control rod scram accumulator pressure is ≥ 955 psig. 940	7 days

SDM Test-Refueling 3.10.8

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
SR	3.10.8.5	Verify each withdrawn control rod does not go to the withdrawn overtravel position.	Each time the control rod is withdrawn to "full out" position
			AND
			Prior to satisfying LCO 3.10.8.c requirement after work on control rod or CRD System that could affect coupling
SR	3.10.8.6	Verify CRD charging water header pressure ≥ 955 psig. 940	7 days

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ACTIONS	A.1 and A.2 (continued)	
	control rod is declared inoperable (Required Action A.2)	

LCO 3.1.3 is entered. This would result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function, in accordance with ACTIONS of LCO 3.1.3.

The allowed Completion Time of 8 hours is reasonable, based on the large number of control rods available to provide the scram function and the ability of the affected control rod to scram only with reactor pressure at high reactor pressures.

B.1, B.2.1, and B.2.2

With two or more control rod scram accumulators inoperable and reactor steam dome pressure \geq 900 psig, adequate pressure must be supplied to the charging water header. With inadequate charging water pressure, all of the accumulators could become inoperable, resulting in a potentially severe degradation of the scram performance. Therefore, within 20 minutes from discovery of charging water header pressure < 955 psig concurrent with Condition B, adequate charging water header pressure must be restored. The allowed Completion Time of 20 minutes is reasonable, to place a CRD pump into service to restore the charging water header pressure, if required. This Completion Time is based on the ability of the reactor pressure alone to fully insert all control rods.

The control rod may be declared "slow," since the control rod will still scram using only reactor pressure, but may not satisfy the times in Table 3.1.4-1. Required Action B.2.1 is modified by a Note indicating that declaring the control rod "slow" only applies if the associated control scram time is within the limits of Table 3.1.4-1 during the last scram time test. Otherwise, the control rod would already be considered "slow" and the further degradation of scram performance with an inoperable accumulator could result in excessive scram times. In this event, the associated control rod is declared inoperable (Required Action B.2.2) and LCO 3.1.3 entered. This would

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B.1, B.2.1, and B.2.2 (continued)

result in requiring the affected control rod to be fully inserted and disarmed, thereby satisfying its intended function in accordance with ACTIONS of LCO 3.1.3.

The allowed Completion Time of 1 hour is reasonable, based on the ability of only the reactor pressure to scram the control rods and the low probability of a DBA or transient occurring while the affected accumulators are inoperable.

C.1 and C.2

With one or more control rod scram accumulators inoperable and the reactor steam dome pressure < 900 psig, the pressure supplied to the charging water header must be adequate to ensure that accumulators remain charged. With the reactor steam dome pressure < 900 psig, the function of the accumulators in providing the scram force becomes much more important since the scram function could become severely degraded during a depressurization event or at low reactor pressures. Therefore, immediately upon discovery of charging water header pressure < 955 psig, concurrent with Condition C, all control rods associated with inoperable accumulators must be verified to be fully inserted. Withdrawn control rods with inoperable accumulators may fail to scram under these low pressure conditions. The associated control rods must also be declared inoperable within 1 hour. The allowed Completion Time of 1 hour is reasonable for Required Action C.2, considering the low probability of a DBA or transient occurring during the time that the accumulator is inoperable.

D.1

The reactor mode switch must be immediately placed in the shutdown position if either Required Action and associated Completion Time associated with the loss of the CRD charging pump (Required Actions B.1 and C.1) cannot be met. This ensures that all insertable control rods are inserted and that the reactor is in a condition that does not require the

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Control Rod Scram Accumulators B 3.1.5

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ACTIONS	D.1 (continued)	
	active function (i.e., scram) of the control rods. This Required Action is modified by a Note stating that the action is not applicable if all control rods associated with the inoperable scram accumulators are fully inserted, since the function of the control rods has been performed.	
SURVEILLANCE REQUIREMENTS	<u>SR 3.1.5.1</u>	
940 -	SR 3.1.5.1 requires that the accumulator pressure be checked every 7 days to ensure adequate accumulator pressure exists to provide sufficient scram force. The primary indicator of accumulator OPERABILITY is the accumulator pressure. A minimum accumulator pressure is specified, below which the capability of the accumulator to perform its intended function becomes degraded and the accumulator is considered inoperable. The minimum accumulator pressure of \$55 psig is well below the expected pressure of approximately 1450 psig	
	(Ref. 1). Declaring the accumulator inoperable when the minimum pressure is not maintained ensures that significant degradation in scram times does not occur. The 7 day Frequency has been shown to be acceptable through operating experience and takes into account indications available in the control room.	
REFERENCES	1. UFSAR, Section 3.4.5.3 and Figure 3.4.10.	
	2. UFSAR, Appendix K, Section VI.	
	3. UFSAR, Chapter 14.	

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B 3.9 REFUELING OPERATIONS

B 3.9.5 Control Rod OPERABILITY-Refueling

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BACKGROUND	Control rods are components of the Control Rod Drive (CRD) System, the primary reactivity control system for the reactor. In conjunction with the Reactor Protection System, the CRD System provides the means for the reliable control of reactivity changes during refueling operation. In addition, the control rods provide the capability to maintain the reactor subcritical under all conditions and to limit the potential amount and rate of reactivity increase caused by a malfunction in the CRD System.
	UFSAR design criteria require that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The CRD System is the system capable of maintaining the reactor subcritical in cold conditions.
APPLICABLE SAFETY ANALYSES	Prevention and mitigation of prompt reactivity excursions during refueling are provided by refueling interlocks (LCO 3.9.1 and LCO 3.9.2), the SDM (LCO 3.1.1), the intermediate range monitor neutron flux scram (LCO 3.3.1.1), and the control rod block instrumentation (LCO 3.3.2.1).
	The safety analyses for the control rod withdrawal error during refueling (Ref. 2) and the fuel assembly insertion error (Ref. 3) evaluate the consequences of control rod withdrawal during refueling and also fuel assembly insertion with a control rod withdrawn. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment. Control rod scram provides protection should a prompt reactivity excursion occur.
	Control rod OPERABILITY during refueling satisfies Criterion 3 of the NRC Policy Statement.
LCO	Each withdrawn control rod must be OPERABLE. The withdrawn control rod is considered OPERABLE if the scram accumulator pressure is \geq 955 psig and the control rod is capable of 940

(continued)

BASES	
LCO (continued)	being automatically inserted upon receipt of a scram signal. Inserted control rods have already completed their reactivity control function, and therefore, are not required to be OPERABLE.
APPLICABILITY	During MODE 5, withdrawn control rods must be OPERABLE to ensure that in a scram the control rods will insert and provide the required negative reactivity to maintain the reactor subcritical.
	For MODES 1 and 2, control rod requirements are found in LCO 3.1.2, "Reactivity Anomalies," LCO 3.1.3, "Control Rod OPERABILITY," LCO 3.1.4, "Control Rod Scram Times," and LCO 3.1.5, "Control Rod Scram Accumulators." During MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod OPERABILITY during these conditions.
ACTIONS	<u>A.1</u>
	With one or more withdrawn control rods inoperable, action must be immediately initiated to fully insert the inoperable control rod(s). Inserting the control rod(s) ensures the shutdown and scram capabilities are not adversely affected. Actions must continue until the inoperable control rod(s) is fully inserted.
SURVEILLANCE	SR 3.9.5.1 and SR 3.9.5.2
REQUIREMENTS	During MODE 5, the OPERABILITY of control rods is primarily required to ensure a withdrawn control rod will automatically insert if a signal requiring a reactor shutdown occurs. Because no explicit analysis exists for automatic shutdown during refueling, the shutdown function is satisfied if the withdrawn control rod is capable of automatic insertion and the associated CRD scram accumulator pressure is \geq 955 psig.
	The 7 day Frequency takes into consideration equipment reliability, procedural controls over the scram accumulators, and control room alarms and indicating lights that indicate low accumulator charge pressures.
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SURVEILLANCE REQUIREMENTS	<u>SR 3.10.8.6</u>
(continued)	CRD charging water header pressure verification is performed to ensure the motive force is available to scram the control rods in the event of a scram signal. Since the reactor is depressurized in MODE 5, there is insufficient reactor pressure to scram the control rods. Verification of charging water header pressure ensures that if a scram were required, capability for rapid control rod insertion would exist. The minimum pressure of 955 psig is well below the expected pressure of approximately 1450 psig while still ensuring sufficient pressure for rapid control rod insertion. The 7 day Frequency has been shown to be acceptable through operating experience and takes into account indications available in the control room.
REFERENCES	 NEDE-24011-P-A-US, General Electric Standard Application for Reactor Fuel, Supplement for United States, February 1991.
	 Letter from T. Pickens (BWROG) to G.C. Lainas, NRC, "Amendment 17 to General Electric Licensing Topical Report NEDE-24011-P-A," August 15, 1986.

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