

The licensee proposed to delete the phrase, "at the Unit 3 intake structure," from the current TS.

The licensee stated that the average UHS temperature is obtained by averaging the temperatures measured at the circulating water system inlet waterboxes located at the intake structure. Based on an evaluation, the licensee determined that measuring at this location is representative of the UHS temperature. The only exception to this would be when a condenser thermal backwashing evolution is being conducted. Since there is a potential for significant water temperature stratification at the intake structure during this evolution, the licensee stated that when thermal backwashing occurs, operability of the UHS should be monitored by temperature instruments in the service water system. Deleting the phrase, "at the Unit 3 intake structure," from the current TS will permit the use of the temperatures measured in the service water system to represent the average UHS temperature during the evolution when a condenser thermal backwashing is being conducted, and is acceptable as described below.

Based on the staff's review of the licensee's rationale, the staff finds that there is no change to the measuring method used to determine the average UHS temperature during normal operation (when a condenser thermal backwashing is not being conducted), and that the use of the temperatures measured in the service water system to represent the average UHS temperature during the evolution when a condenser thermal backwashing occurs provides an alternate method and a more conservative approach to determine the average UHS temperature. Therefore, the staff agrees with the licensee that operability of the UHS should be monitored by temperature instruments in the service water system during the brief period when a condenser thermal backwashing evolution is being conducted. No safety significance is attached to the UHS temperature monitoring location, as long as the location is representative of the average temperature of the circulating and service water systems. The monitoring location should measure a temperature representative of the temperature of cooling water which reaches the heat exchangers where heat is rejected from reactor and plant heat sources. The optimum location can vary for a particular plant based on the operation configuration (as in this case during condenser backwash). The location of measurement is not required to be in Technical specifications by 10 CFR 50.36(c)(2)(ii)(A), (B), (C), or (D). Also, the staff concludes that deleting the phrase, "at the Unit 3 intake structure," from the current TS will have insignificant or no impact on the performance of both safety and non-safety systems. Therefore, the staff finds the above proposed changes acceptable.

2.2 TS Section 3.7.5 - Action

With regard to action, current TS Section 3.7.5 requires that:

With the requirement of the above application not satisfied, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours.