REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 4.1.3.1.3 All control rods shall be demonstrated OPERABLE by performance of Surveillance Requirements 4.1.3.2, 4.1.3.3, 4.1.3.4 and 4.1.3.5.
- 4.1.3.1.4 The scram discharge volume shall be determined OPERABLE by demonstrating:
 - a. The scram discharge volume drain and vent valves OPERABLE at least once per 18 months by verifying that the drain and vent valves:
 - Close within 30 seconds after receipt of a signal for control rods to scram, and
 - Open when the scram signal is reset.
 - b. Proper level sensor response by performance of a CHANNEL FUNCTIONAL TEST of the scram discharge volume scram and control rod block level instrumentation at least once per 31 days.

* Openbility testing may be extended to be performed during the F:Fth refueling outage.

TABLE 4.3.1.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL _CHECK_	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS IN WHICH SURVEILLANCE REQUIRED
8. Drywell Pressure - High	S	Q	R(a)	1, 2(1)
9. Scram Discharge Volume Water Level - High				1, 2
a. Level Transmitter	S	n	R ^(g)	
b. Float Switches	NA	Q	R	1, 2, 5 ^(k) 1, 2, 5 ^(k)
O. Turbine Stop Valve - Closure	NA	Q	R	1, 2, 3
1. Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low				
LLESSUIE - FOM	NA	Q	R	1
2. Reactor Mode Switch				•
Shutdown Position	NA	K(0)	NA	1 2 2 4 -
13. Manual Scram		3005	****	1, 2, 3, 4, 5
	NA	1(0)	NA	1, 2, 3, 4, 5

⁽a) Neutron detectors may be excluded from CHANNEL CALIBRATION.

⁽b) The IRM and SRM channels shall be determined to overlap for at least 1/2 decades during each startup after entering OPERATIONAL CONDITION 2 and the IRM and APRM channels shall be determined to overlap for at least 1/2 decades during each controlled shutdown, if not performed within the previous 7 days.

⁽c) Deleted

TABLE 4.3.1.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

- This calibration shall consist of the adjustment of the APRM channel to conform to the power values calculated by a heat balance during OPERATIONAL CONDITION 1 when THERMAL POWER > 25% of RATED THERMAL POWER. Adjust the APRM channel if the absolute difference is greater than 2% of RATED THERMAL POWER. The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reaching 25% of RATED THERMAL POWER. To functionally implement this protective function during entry into single loop operation, APRM channel gain adjustments may be made in lieu of adjusting the APRM Flow Biased Simulated Thermal Power-High Trip Setpoint and Allowable Value equations for a period not to exceed 72 hours, provided the criteria in Note b to Table 2.2.1-1 are met. Any APRM channel gain adjustments made in compliance with Specifications 2.2.1 and 3.3.1 shall not be included in determining the absolute difference.
- This calibration shall consist of the adjustment of the APRM flow biased channel to conform to a calibrated flow signal.
- The LPRMs shall be calibrated at least once per 1000 MWD/T using the TIP system. (f)
- Calibrate trip unit setpoint at least once per 92 days. (q)
- Verify measured core flow (total core flow) to be greater than or equal to established core flow at the existing loop flow (APRM & flow).
- This calibration shall consist of verifying that the simulated thermal power time constant is within the (i) limits specified in the COLR.
- This function is not required to be OPERABLE when the reactor pressure vessel head is removed per (j) Specification 3.10.1.
- With any control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or (k) 3.9.10.2.
- This function is not required to be OPERABLE when Drywell Integrity is not required.
- The CHANNEL CALIBRATION shall exclude the flow reference transmitters, these transmitters shall be calibrated at least once per 18 months, except that this test may be extended to be performed during the fifth refueling outage.
- CHANNEL CALIBRATION may be extended to be performed during the fifth refueling outage. (n)
- LOGIC SYSTEM FUNCTIONAL TESTING may be extended to be performed during the fifth refueling outage.

Attachment 2 PY-CEI/NRR-2013L Page 3 of 4

chan

S 7

0

7

+

5

Pa

0

0

5 ch

2

2

か

completeness

. CONTAINMENT SYSTEMS

MSIV LEAKAGE CONTROL SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.4 Two independent MSIV leakage control system (LCS) subsystems shall be OPERABLE.

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

ACTION:

With one MSIV leakage control system subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

- 4.6.1.4 Each MSIV leakage control system subsystem shall be demonstrated OPERABLE:
 - a. At least once per 31 days by verifying:
 - Blower OPERABILITY by starting the blower(s) from the control room and operating the blower(s) for at least 15 minutes.
 - Inboard heater OPERABILITY by demonstrating electrical continuity of the heating element circuitry by verifying the inboard heater draws 8.28± 10% amperes per phase.
 - b. During each COLD SHUTDOWN, if not performed within the previous 92 days, by cycling each motor operated valve, including the main steam stop valves, through at least one complete cycle of full travel.
 - c. At least once per 18 months by:
 - 1. Performance of a functional test which includes simulated actuation of the subsystem throughout its operating sequence, and verifying that each automatic valve actuates to its correct position, and the blower(s) start(s).
 - Verifying that the blower(s) develop(s) at least the below required vacuum at the rated capacity:
 - a) Inboard system, 15" H_2O at \geq 100 scfm.
 - b) Outboard system, 15° H₂O at ≥ 200 scfm.
 - d. By verifying the inboard flow and inboard and outboard pressure instrumentation to be OPERABLE by performance of a:
 - 1. CHANNEL FUNCTIONAL TEST at least once per 31 days and 2. CHANNEL CALIBRATION at least once per 18 months.

*The provisions of Specification 3.0.4 are not applicable from the effective date of this amendment until the completion of Operating Cycle 6.

torme B De 2 -5 tende 0 6 らい 2 6 4 test 5 **

Attachment 3 PY-CEI/NRR-2013L Page 1 of 2

SIGNIFICANT HAZARDS CONSIDERATION

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's Regulations, 10 CFR 50.92, which state that the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (2) create the possibility of a new or different kind of accident from any previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed amendment has been reviewed with respect to these three factors and it has been determined that the proposed change does not involve a significant hazard because:

 The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed TS change requests a one-time extension of the surveillance intervals related to: a) RPS Instrumentation LSFTs; b) system initiation or functional testing; and, c) Main Steam Isolation Valve Leakage Control System (MSIV-LCS) instrument calibration.

The discussion in the License Amendment Request demonstrates the following.

- i) The Rosemount transmitter calibration period extension is acceptable based on Rosemount Report D8900126, Revision A which supported extension of the calibration interval from 18 months to 30 months based on the reduction in the drift allowance.
- ii) The LSFT interval extension is acceptable based on the NRC Safety Evaluation Report (Peach Bottom Atomic Power Plant, Units 2 and 3, dated August 2, 1993) which supported extension of the interval for LSFT from 18 to 24 months. This was based on the small probability of relay or contact failure relative to mechanical component failure probability. The increase in LSFT interval represented no significant change in the overall safety system unavailability.
- iii) The system initiation and functional testing interval is acceptable based on the periodic testing of components during power operation and the short period of time the interval is being extended.

Therefore, from the above it is shown that the proposed change will not significantly increase the probability of an accident previously evaluated.

 The proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS change requests a one-time extension of the surveillance intervals for instrument calibration, instrument channel LSFT, and system actuation and functional testing. The proposed changes do not necessitate a physical alteration to the plant (no new or different type of equipment will be installed). The requested extension durations are small as compared to the overall interval allowed by TS; drift data supports

Attachment 3 PY-CEI/NRR-2013L Page 2 of 2

extension of the calibration intervals; NRC and industry evaluations support extension of LSFT; and past testing and periodic testing provides confidence of no effect on equipment availability by extending the surveillance interval. Considering the above, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change will not involve a significant reduction in the margin of safety.

The TS changes requested propose a one-time extension of the surveillance intervals for instrument calibration, instrument channel LSFT, and system actuation and functional testing. The proposed changes do not necessitate a physical alteration to the plant (no new or different type of equipment will be installed). The requested extension durations are small as compared to the overall interval allowed by TS; drift data supports extension of the calibration intervals; NRC and industry evaluations support extension of LSFT; and past testing and periodic testing provides confidence of no effect on equipment availability by extending the surveillance interval. Considering the above, the change does not involve a significant reduction in the margin of safety.