

HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSES NPF-57
DOCKET NO. 50-354
CHANGE TO TECHNICAL SPECIFICATIONS
IMPROVEMENT TO TECHNICAL SPECIFICATION SECTION 3.1.3.5, CONTROL
ROD SCRAM ACCUMULATORS

TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following Technical Specifications for Facility Operating License No. NPF-57 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
3/4.1.3.5	3/4 1-9 and 3/4 1-10
BASES 3/4.1.3	B 3/4 1-2 and B 3/4 1-3

REACTIVITY CONTROL SYSTEMS
CONTROL ROD SCRAM ACCUMULATORS
LIMITING CONDITION FOR OPERATION

3.1.3.5 ^{Each} ~~At least~~ control rod scram accumulator~~s~~ shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 5*.

ACTION: Added: NOTE

- a. In OPERATIONAL CONDITIONS 1 or 2: *and reactor pressure ≥ 900 psig*
1. With one control rod scram accumulator inoperable[^], within 8 hours:
 - a) Restore the inoperable accumulator to OPERABLE status, or
 - b) Declare the control rod associated with the inoperable accumulator inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

2. With more than one control rod scram accumulator inoperable, declare the associated control rods inoperable and:
- a) If the control rod associated with any inoperable scram accumulator is withdrawn, immediately verify that at least one control rod drive pump is operating by inserting at least one withdrawn control rod at least one notch. If no control rod drive pump is operating: 1) If reactor pressure is ≥ 900 psig, restart at least one control rod drive pump within 20 minutes or place the reactor mode switch in the Shutdown position. 2) If reactor pressure is < 900 psig, place the reactor mode switch in the Shutdown position.
 - b) Insert the inoperable control rods and disarm the associated control valves either:
 - 1) Electrically, or
 - 2) Hydraulically by closing the drive water and exhaust water isolation valves.

Otherwise, be in at least HOT SHUTDOWN within 12 hours.

- b. In OPERATIONAL CONDITION 5*:

1. With one withdrawn control rod with its associated scram accumulator inoperable, insert the affected control rod and disarm the associated directional control valves within one hour, either:
 - a) Electrically, or
 - b) Hydraulically by closing the drive water and exhaust water isolation valves.
2. With more than one withdrawn control rod with the associated scram accumulator inoperable and no control rod drive pump operating, immediately place the reactor mode switch in the Shutdown position.

- c. The provisions of Specification 3.0.4 are not applicable.

*At least the accumulator associated with each withdrawn control rod. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

See new
Action
3.1.3.5.a.2.a&b
and
3.1.3.5.a.3.a&b

See new
action
3.1.3.5.b

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS

4.1.3.5 Each control rod scram accumulator shall be determined OPERABLE:

- a. At least once per 7 days by verifying that the indicated pressure is greater than or equal to 940 psig unless the control rod is inserted and disarmed or scrambled.

b. At least once per 18 months by:

1. Performance of a:

- a) CHANNEL FUNCTIONAL TEST of the leak detectors, and
- b) CHANNEL CALIBRATION of the pressure detectors, and verifying an alarm setpoint of $940 \pm 95, -0$ psig on decreasing pressure.

DELETED →

REACTIVITY CONTROL SYSTEMS
CONTROL ROD SCRAM ACCUMULATORS
LIMITING CONDITION FOR OPERATION

3.1.3.5 Each control rod scram accumulator shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 5*.

ACTION:

-----NOTE-----
Separate condition entry is allowed for each control rod

- a. In OPERATIONAL CONDITIONS 1 or 2:
1. With one control rod scram accumulator inoperable and reactor pressure \geq 900 psig, within 8 hours,
 - a) Restore the inoperable accumulator to OPERABLE status, or
 - b) Declare the control rod associated with the inoperable accumulator inoperable.
 2. With two or more control rod scram accumulators inoperable and reactor pressure \geq 900 psig,
 - a) Within 20 minutes of discovery of this condition concurrent with charging water pressure $<$ 940 psig, restore charging water header pressure to \geq 940 psig otherwise place the mode switch in the shutdown position**, and
 - b) Within one hour, declare the associated control rod inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

* At least the accumulator associated with each withdrawn control rod. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

** Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods.

REACTIVITY CONTROL SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

3. With one or more control rod scram accumulators inoperable and reactor pressure < 900 psig,
 - a) Immediately upon discovery of charging water header pressure < 940 psig, verify all control rods associated with inoperable accumulators are fully inserted otherwise place the mode switch in the shutdown position**, and
 - b) Within one hour, declare the associate control rod(s) inoperable.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

- b. In OPERATIONAL CONDITION 5*
 1. With one or more withdrawn control rods inoperable, upon discovery immediately initiate action to fully insert inoperable withdrawn control rods.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.1.3.5 Each control rod scram accumulator shall be determined OPERABLE:

- a. At least once per 7 days by verifying that the indicated pressure is greater than or equal to 940 psig unless the control rod is inserted and disarmed or scrammed.

* At least the accumulator associated with each withdrawn control rod. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

** Not applicable if all inoperable control rod scram accumulators are associated with fully inserted control rods.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.3 CONTROL RODS

The specifications of this section ensure that (1) the minimum SHUTDOWN MARGIN is maintained, (2) the control rod insertion times are consistent with those used in the accident analysis, and (3) limit the potential effects of the rod drop accident. The ACTION statements permit variations from the basic requirements but at the same time impose more restrictive criteria for continued operation. A limitation on inoperable rods is set such that the resultant effect on total rod worth and scram shape will be kept to a minimum. The requirements for the various scram time measurements ensure that any indication of systematic problems with rod drives will be investigated on a timely basis.

INSERT
A

Damage within the control rod drive mechanism could be a generic problem, therefore with a withdrawn control rod immovable because of excessive friction or mechanical interference, operation of the reactor is limited to a time period which is reasonable to determine the cause of the inoperability and at the same time prevent operation with a large number of inoperable control rods.

Control rods that are inoperable for other reasons are permitted to be taken out of service provided that those in the nonfully-inserted position are consistent with the SHUTDOWN MARGIN requirements.

The number of control rods permitted to be inoperable could be more than the eight allowed by the specification, but the occurrence of eight inoperable rods could be indicative of a generic problem and the reactor must be shutdown for investigation and resolution of the problem.

The control rod system is designed to bring the reactor subcritical at a rate fast enough to prevent the MCPR from becoming less than the fuel cladding Safety Limit during the limiting power transient analyzed in Section 15.4 of the FSAR. This analysis shows that the negative reactivity rates resulting from the scram with the average response of all the drives as given in the specifications, provide the required protection and MCPR remains greater than the fuel cladding Safety Limit. The occurrence of scram times longer than those specified should be viewed as an indication of a systematic problem with the rod drives and therefore the surveillance interval is reduced in order to prevent operation of the reactor for long periods of time with a potentially serious problem.

The scram discharge volume is required to be OPERABLE so that it will be available when needed to accept discharge water from the control rods during a reactor scram and will isolate the reactor coolant system from the containment when required.

Control rods with inoperable accumulators are declared inoperable and Specification 3.1.3.1 then applies. This prevents a pattern of inoperable accumulators that would result in less reactivity insertion on a scram than has been analyzed. even though control rods with inoperable accumulators may still be inserted with normal drive water pressure. Operability of the accumulator ensures that there is a means available to insert the control rods even under the most unfavorable depressurization of the reactor.

REPLACE
with
B

INSERT A

The operability of an individual control rod is based on a combination of factors, primarily, the scram insertion times, the control rod coupling integrity, and the ability to determine the control rod position. Accumulator operability is addressed by LCO 3.1.3.5. The associated scram accumulator status for a control rod only affects the scram insertion times; therefore, an inoperable accumulator does not immediately require declaring a control rod inoperable. Although not all control rods are required to be operable to satisfy the intended reactivity control requirements, control over the number of inoperable control rods is required.

Control rod insertion capability is demonstrated by surveillance 4.1.3.1.2 inserting each partially or fully withdrawn control rod at least one notch and observing that the control rod moves. The control rod may then be returned to its original position. This ensures the control rod is not stuck and is free to insert on a scram signal. At any time, a control rod is immovable for reasons not associated with the control rod drive mechanism, a determination of that control rod's trippability (Operability) must be made and appropriate actions taken. As an example, if the control rod can be scrammed, but can not be moved due to a RMCS failure, the rod(s) may continue to be considered OPERABLE provided all other related surveillances are current.

INSERT B

The OPERABILITY of the control rod scram accumulators is required to ensure that adequate scram insertion capability exists when needed over the entire range of reactor pressures. The OPERABILITY of the scram accumulators is based on maintaining adequate accumulator pressure.

In OPGON 1 and 2, the scram function is required for mitigation of DBAs and transients, and therefore the scram accumulators must be OPERABLE to support the scram function. In OPGON 3 and 4, control rods are only allowed to be withdrawn under limits imposed by the reactor mode switch being in shutdown and by the control rod block being applied. This provides adequate requirements for control rod scram accumulator OPERABILITY during these conditions. In OPGON 5, withdrawn control rods are required to have OPERABLE accumulators.

The actions of Specification 3.1.3.5 are modified by a note indicating that a separate Condition entry is allowed for each control rod scram accumulator. This is acceptable since the required Actions for each Condition provide appropriate compensatory actions for each affected accumulator. Complying with the Required Actions may allow for continued operation and subsequent affected accumulators governed by subsequent Condition entry and application of associated Required Actions.

With two or more control rod scram accumulators inoperable and reactor pressure ≥ 900 psig, adequate pressure must be supplied to the charging water header. With inadequate charging water pressure, the accumulators could become inoperable, resulting in a potential degradation of the scram performance. Therefore, within 20 minutes from discovery of charging water header pressure < 940 psig concurrent with conditions in Action 3.1.3.5 a.2, 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 header pressure, if required. This Completion Time is based on the ability of the reactor pressure alone to fully insert all control rods.

With one or more control rod scram accumulators inoperable and the reactor pressure < 900 psig, the pressure supplied to the charging water header must be adequate to ensure that accumulators remain charged. With the reactor pressure < 900 psig, the function of the accumulators in providing the scram force becomes much more important since the scram function could become degraded during a depressurization event or at low reactor pressures. Therefore, immediately upon discovery of charging water header pressure < 940 psig, concurrent with conditions in Action 3.1.3.5 a.3, 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 considering the low probability of DBA or transient occurring during the time that the accumulator is inoperable.

The reactor mode switch must be immediately placed in the shutdown position if either Required Action and associated Completion Time associated with loss of the CRD charging pump (Required Actions 3.1.3.5 a.2.a or 3.1.3.5 a.3.a) cannot be met. This ensures that all insertable control rods are inserted and that the reactor is in condition that does not require the 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 Requirement 4.1.3.5 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. 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.