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Discussion Of Change

- A 002 CTS 3.4.A, 3.4.B, 3.4.C, 3.4.D, 3.3.C, 3.3.D, 3.6.E and 3.6.F. The CTS contain prose descriptions of the conditions for which the specification is applicable. This description has been replaced with the equivalent MODES of applicability for the ITS. Since the plant conditions to which this specification apply have not changed, this is an administrative change.
- L 003 CTS 3.4.A.2.a. A new Condition and associated Required Action and Completion Time are included to allow 4 hours to restore the inoperable MSSV to operable status or begin preparations to shut the plant down. PI CTS does not address the condition when a MSSV is inoperable. The 4 hour Completion Time is reasonable to assess the inoperability and perform minor repairs. The probability of an event or transient occurring during this 4 hour period which requires any given MSSV to be operable is extremely low. In the remote case an event did occur during this time the plant would rely upon other systems (i.e. PORVs) to shut the plant down in a safe manner. PI is not proposing to continue plant operation for extended periods at reduced power with less than all ten MSSVs operable; therefore an allowed outage time is required to restore an inoperable valve and make preparations to shut down. This change is less restrictive since CTS would require entry into CTS 3.0.C which would allow the plant to continue to operate 1 hour while corrective actions are pursued.

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L	007	CTS 3.4.A.2.a. This change will allow one SG PORV to be inoperable for 7 days and two SG PORVs inoperable for 1 hour. It is acceptable to have one SG PORV inoperable for this length of time because the other SG PORV is still operable and there are other comparable means of heat removal such as the Steam Dump and Main Steam Safety Valves. It is acceptable to have two SG PORVs inoperable for 1 hour because there is a low probability of a SG Tube Rupture coincident with a loss of offsite power. Also there are other means of removing heat such as the Steam Dump and Main Steam Safety Valves. Since these changes extend the time the plant can operate with equipment out of service, these changes are less restrictive.
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| M | 008 | CTS 3.4.B.1.a and 3.4.B.2. In conformance with the guidance of NUREG-1431, the more general term "train" is used instead of only requiring AFW pumps to be operable. Since the requirement for a "train" to be operable may require more equipment, this change is more restrictive. Also the specifications have been simplified in that the AFW requirements for a single unit operating are specified. If two units are operating, then the same requirements apply to each unit individually. CTS 3.4.B.2 also contained a statement that if the OPERABILITY of the AFW pump is not restored to OPERABILITY within the specified time, place the affected unit (or either unit in the case of the motor driven AFW pump inoperability) or initiate a shutdown track. PI design is that a motor driven AFW pump can be cross tied and aligned to provide feedwater to the SGs to the other unit. In this case, one unit must be in a shutdown condition and the other unit motor driven AFW pump inoperable. PI is deleting this CTS flexibility and therefore, making this a more restrictive change. Eliminating this flexibility is acceptable since the ITS provides specific Conditions and Required Actions for individual unit equipment inoperabilities. |
| | 009 | CTS 3.4.B.1.b. The AFW requirements for two units operating have been included in the ITS LCO such that the requirements are the same for each operating unit; thus a separate statement for two unit operation is not required. Since these requirements have been incorporated into the ITS, this is an administrative change. |
| | 010 | Not used. |

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L	011	CTS 3.4.B.1.c. This statement has been replaced with a LCO Note which specifies that AFW is considered operable during alignment and operation for SG level control if capable of being manually realigned to the AFW mode of operation. Since the note is broader in scope than this specification, this change is considered less restrictive. This change incorporates the conditions of NRC letter from Beth Wetzel to Roger Anderson, dated October 17, 1997.
M	012	A new SR, 3.7.5.1, is included which requires that AFW valves that are not locked, sealed or otherwise secured in position, are in the correct position. Since this SR requires additional plant activities, it is more restrictive. This more restrictive change is included to make the PI ITS complete. This change is consistent with the guidance of NUREG-1431.
M	013	A new specification, 3.7.2, is included which requires two MSIVs to be operable. PI CTS require surveillance of the MSIVs but does not include any limiting conditions for operations. Since this new specification places additional restrictions on the plant, this change is more restrictive. This change is included to make the PI ITS consistent with the guidance of NUREG-1431. This change is acceptable because the MSIVs are currently administratively required to be operable by the plant.

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| M | 014 | A new specification, 3.7.3, is included which requires two MFRVs and associated bypass valves to be operable. Since this new specification places additional restrictions on the plant, this change is more restrictive. This change is included to make the PI ITS consistent with the guidance of NUREG-1431. This change is acceptable because the MFRVs and associated bypass valves are currently administratively required to be operable by the plant. |
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| M | 015 | Two new SRs, 3.7.3.1 and 3.7.3.2 are included which require verification of the isolation time for the MFRV and MFRV bypass valves on an actual or simulated signal. Since these new specifications place additional restrictions on the plant, these changes are more restrictive. These changes are included to make the PI ITS consistent with the guidance of NUREG-1431. These changes are acceptable because the MFRVs and MFRV bypass valves are currently administratively required to be operable by the plant. |
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| M | 016 | CTS 3.4.B.1.d. The CTS requirement for 100,000 gallons of water in the CTSs is clarified to require 100,000 gallons per unit. Since this requires more water than is currently required, this is a more restrictive requirement. This change is acceptable because the plant currently maintain 100,000 gallons per unit in accordance with current plant procedures. |

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| LR | 017 | CTS 3.4.B.1.d. The details of the OPERABILITY requirements for the condensate storage tank, including backup water supply requirements have been relocated to the Bases. These specification details are unnecessary since the Specification requirement that the CST is OPERABLE envelopes these requirements. This change is consistent with the guidance of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive. |
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| LR | 018 | CTS 3.4.B.1.e, f and g. The details of the OPERABILITY requirements for AFW system motor operated and manual valves, and condensate cross connect valve to the AFW system have been relocated to the TRM. These specification details are unnecessary in the TS since the Specification requirement that the AFW system is OPERABLE envelopes these requirements. This change is consistent with the guidance of NUREG-1431. Since the TRM is licensee controlled, this change is less restrictive. This change is acceptable since the TRM is under the regulatory controls of 10 CFR 50.59. |

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| LR | 019 | CTS 3.4.B.2.a. CTS and ITS allow startup to proceed without demonstration of AFW pump and associated valve operability. CTS details on the conditions of inoperability have been relocated to the Bases. This change is consistent with the guidance of NUREG-1431 as modified by approved travellers. This change is acceptable because the turbine driven AFW pumps will continue to be maintained and tested as they are under the CTS requirements. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive. |
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| A | 020 | CTS 3.4.B.2. CTS states that. "any one of the following conditions of inoperability may exist . . ." This requirement prevents two or more of the listed conditions from existing at the same time. The limitation that only one condition of inoperability may exist is not explicitly stated in ITS. In ITS, these conditions may be in more than one specification. However, in the NUREG-1431 format, the SFDP exists to provide a mechanism to assure that entry into multiple TS Conditions will not result in loss of safety function. Thus the SFDP limits these conditions from simultaneous existence when there is a loss of safety function. The Maintenance Rule will also assure that multiple equipment inoperabilities are evaluated for reduction of plant safety. Since the ITS includes provisions to address this clause, there is no net change in plant safety and this is an administrative change. |

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A	021	CTS 3.4.B.2.a. The CTS requirements for completion of turbine driven AFW pump testing have been reworded to be consistent with the NUREG-1431 format. Since there are no substantive changes, this is an administrative change.
L	022	CTS 3.4.B.2. A new Condition is included which allows one steam supply to the turbine driven AFW pump to be inoperable for 7 days and 10 days from discovery of failure to meet the LCO. This is less restrictive since the CTS allow a TDAFW pump, valve or piping to be inoperable for 72 hours. However, the TDAFW pump is NOT inoperable when one steam supply is inoperable. Seven days and 10 days from discovery of failure to meet the LCO are acceptable since there is a redundant steam supply to the pump; there is also a redundant motor driven pump and there is a low probability of an event which requires the inoperable steam supply to the TDAFW pump. This change is consistent with the guidance of NUREG-1431.
M	023	CTS 3.4.B.2.a. The CTS requirement that specifies equipment that may be inoperable is generalized to allow an AFW train to be inoperable. Since more equipment under this specification may make the AFW train inoperable, this change is considered more restrictive. Since a "train" of equipment is more inclusive, this change may enhance plant safety. This change is consistent with the guidance of NUREG-1431.

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LR	024	CTS 3.4 B.2.b. Since the ITS specifies that a whole train may be inoperable, the definition of equipment that may be inoperable is unnecessary in the TS and therefore relocated to the Bases. This change is consistent with the guidance of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive.
L	025	CTS 3.4.B.2.c. This change will allow the CSTs to be inoperable for 7 days. This is acceptable due to the availability of the backup supply of water from the cooling water system and the low probability of an event during this time which will require the CSTs. Also, inoperable CSTs does not necessarily mean total loss of function, such as the circumstances when the CST level is low. This change is consistent with the guidance of NUREG-1431. Since plant equipment may be inoperable for additional time beyond that allowed in the CTS, this change is less restrictive.
M	026	CTS 3.4.B.2.c. The ITS requires verification of cooling water supply availability within four hours and every 12 hours thereafter. This additional verification provides that the plant will be maintained in a safe condition during the extended time the CSTs are allowed to be inoperable. Since a specific time for verification is provided, this is a more restrictive change. Verification within 4 hours and every 12 hours thereafter does not place the plant at risk and may improve plant safety. This change is consistent with the guidance of NUREG-1431.

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| M | 027 | A new SR, 3.7.6.1, is included which requires verification of the CST inventory every 12 hours. Currently plant procedures require verification of CST inventory; however, since this SR makes this verification a TS requirement, this change is considered more restrictive. This more restrictive change is included to make the PI ITS complete. This change is consistent with the guidance of NUREG-1431. |
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| LR | 028 | CTS 3.4.B.2.d. The details of inoperability conditions for the AFW backup supply of water from the cooling water system have been relocated to the Bases for the AFW system. AFW system OPERABILITY will require the availability of the backup water supply. Therefore, these specification details are unnecessary since the Specification requirement for AFW system OPERABILITY and associated ACTIONS envelope these requirements. This change is consistent with the guidance of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive. |

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LR 029 CTS 3.4.B.2.e. The details of inoperability conditions for AFW system valves have been relocated to the TRM. These specification details are unnecessary since the Specification requirement for AFW system OPERABILITY and associated ACTIONS envelopes these requirements. This change is consistent with the guidance of NUREG-1431. Since the TRM is licensee controlled, this change is less restrictive. This change is acceptable since the TRM is under the regulatory controls of 10 CFR 50.59.

This CTS requirement does not meet 10CFR50.36(c)(2)(ii) criteria for inclusion into the ITS as follows:

Criterion 1: Installed instrumentation that is used to detect and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

This Specification only applies to valve position lights for AFW system motor operated valves MV32242 and MV32243 (unit 2 MV32248 and MV32249). These lights show AFW valve position and do not provide any function for detection of an abnormal degradation of the reactor coolant system. Therefore, they do not meet criteria 1.

Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission barrier:

This Specification only provides valve position indication which is not an operating restriction nor assumed as initial conditions for a design basis accident or transient analysis. These lights do not control any equipment nor are they controlled by plant operators to mitigate any accident or event. Therefore, they do not meet criteria 2.

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Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier:

These lights are not a structure, system, or component that are a primary success path or actuates to mitigate a design basis accident. These lights only provide a visual aid for the control room operators to monitor AFW valve position. Therefore, they do not meet criteria 3.

Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

Again, these lights only provide a valve status of open or closed. They do not have any initiating signals nor generate any to actuate valve position or throttling. There has not been any operating experience or probabilistic risk assessment issues at PI for these lights. Therefore, they do not meet criteria 4.

Based on the above, these lights can be relocated to a Licensee Controlled Document.

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M	030	CTS 3.4.D. CTS requires the plant to meet secondary coolant radiochemistry requirements while in MODES 1, 2, and 3. When these limits are not met the plant is required to go to MODE 4 within 12 hours. These requirements have been conformed to the more restrictive requirements of NUREG-1431 by applying the radiochemistry limits in MODE 4 and requiring the plant to go to MODE 5 within 36 hours. This change is acceptable since it will not cause any unsafe plant operations and is consistent with current plant operating practices when radiochemistry limits are not met in MODE 4.
	031	Not used.

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- R 032 CTS 3.4 C and 4.8.C. This specification provides requirements for the plant Steam Exclusion System. The Steam Exclusion System LCO and SR requirements have been relocated to the TRM since the system does not meet the criteria of 10 CFR 50.36 for inclusion in the Technical Specifications.
- This system is an installed system for preventing steam from high energy line breaks from reaching safeguards equipment; thus it does not meet 10 CFR 50.36 (c)(2)(ii) Criterion 1 or 2.
- The Steam Exclusion System is an installed system. However, it does not mitigate accidents and thus is not a primary success path for mitigating accidents. Therefore, the Steam Exclusion System does not meet 10 CFR 50.36 (c)(2)(ii) Criterion 3.
- The Steam Exclusion System is not considered in the plant IPE and it is not a system which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Therefore this system does not meet 10 CFR 50.36 (c)(2)(ii) Criterion 4.
- L 033 CTS Table 3.5-2B, Functional Unit 5a and Table 4.1-1B, Functional Unit 5a. CTS requires operability of the main steam line isolation valves manual switches at all times when in MODE 2. In the ITS, MODE 2 applicability is modified by a condition which does not require these switches to be operable when both MSIVs are closed. Since this change limits the applicability for these switches, this is a less restrictive change. This change is acceptable since the steam line isolation function is met passively without these switches operable when both MSIVs are closed. This change conforms to the guidance of NUREG-1431.

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A	034	CTS Table 3.5-2B, Note c and Table 4.1-1B, Note 23. The format of this note has been revised to conform to the guidance of NUREG-1431. The note has been restated but has the same meaning; therefore this is an administrative change.
M	035	CTS 3.4.D. For consistency with NUREG-1431, 3.7.18 action statements, the one hour to initiate actions necessary to place the unit in MODE 3 has been deleted. Since this change may require the plant to shutdown sooner, it is a more restrictive change. This change does not cause the plant to be operated in an unsafe manner.
A	036	CTS3.3.C.1. The CTS has separate specifications for single unit or two unit operations. The ITS is written such that the requirements are the same for single or two unit operation. Any differences are addressed in the Bases.
M	037	CTS 3.3.C.1.a.1. For consistency with the format guidance of NUREG-1431, the requirement for two CC pumps to be OPERABLE has been generalized to require two trains of CC to be operable. Since this may require more equipment to be operable, this is a more restrictive requirement. This change is acceptable since the requirement for two trains may increase plant safety.

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| LR | 038 | CTS 3.3.C.1.a.2. Since the ITS specifies that a whole train is required to be OPERABLE, the definition of specific components required to be OPERABLE is unnecessary in the TS and therefore relocated to the Bases. This change is consistent with the guidance of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive. |
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| M | 039 | A new SR, 3.7.7.1, is included which requires that CC valves in flow paths to safety related equipment that are not locked, sealed, or otherwise secured in position, are in the correct position. Since this SR may require additional plant activities, it is more restrictive. This more restrictive change is included to make the PI ITS complete. This change is consistent with the guidance of NUREG-1431. This change is acceptable since it may increase plant safety. |

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M	040	<p>CTS Table 3.5-2B, Action 27. The CTS requirements for the main steam line isolation valve (MSIV) manual switches are included in the ITS LCO 3.7.2 requirements because: 1) LCO 3.7.2 is a new specification for PI which should include all applicable design features of the MSIVs; and 2) these switches directly operate the MSIV without any intervening logic circuitry. CTS requires an inoperable MSIV manual switch to be restored to operability within 48 hours. ITS LCO 3.7.2 requires the MSIVs (including switches) to be restored to operability within 8 hours or be in MODE 2 within 14 hours, close the valve within 22 hours and verify the valve to be closed once per 7 days. Since this will require the plant to shut down much sooner, this is a more restrictive change. This change is acceptable since it places the plant in a safer condition sooner and does not introduce any unsafe plant operations or tests.</p>
LR	041	<p>CTS3.3.C.2. The new format of the PI ITS requires that each unit has two trains OPERABLE. The details of equipment required to define two OPERABLE trains is contained in the Bases. Therefore, these details are unnecessary in the TS and are relocated to the Bases. This change is consistent with the guidance of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive.</p>

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M	042	<p>CTS3.3.D.1. For consistency with the format guidance of NUREG-1431, the detailed listing of equipment required to be OPERABLE has been generalized to require two trains of Cooling Water (CL) to be operable. Since this may require more equipment to be operable, this is a more restrictive requirement. This change is acceptable since the requirement for two trains may increase plant safety.</p>
LR	043	<p>CTS 3.3.D.1.a., b., and c. .The new format of the PI ITS requires that each unit has two trains OPERABLE. The details of equipment required to define two OPERABLE trains is contained in the Bases and TRM. This change is consistent with the guidance of NUREG-1431.</p> <p>This change also relocates the CTS requirements for non-safeguards CL pumps to the TRM. The non-safeguards pumps do not detect RCS leakage, they are not an initial condition of a DBA, they are not components that are part of the primary success path for mitigation of a DBA and they are not significant to public health and safety; thus these pumps do not meet the Screening Criteria for inclusion in the ITS.</p> <p>Relocating CTS requirements to the TRM or Licensee Controlled Document is less restrictive.</p>

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| A | 044 | CTS3.3.D.1.a. For clarity and consistency with the format requirements of NUREG-1431, the CTS requirements for safeguards CL pump inoperability have been restated as "No safeguards pumps OPERABLE for one train . . ." Since this statement is substantively the same as the CTS requirements and does not change any requirements for plant operation, this is an administrative change. |
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| A | 045 | CTS 3.3.D.2.a.(1) and (2). CTS provides specific actions to be taken if two CL safeguards pumps are inoperable. These actions include cross train checks, verify support and supported relationships, and to ensure that there is not a loss of function in the CL system. Under the guidance and format of NUREG-1431, these specific actions are incorporated and verified under the Safety Function Determination Program (SFDP) as required by LCO 3.0.6 and 5.5.13, Safety Function Determination Program. This change is acceptable since the actions required to assure the plant is operated safely without loss of safety function is provided by the required Safety Function Determination Program. This change is consistent with the guidance of NUREG-1431. This is an Administrative change since the CTS requirements are consistent with those in the ITS. |

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M	046	<p>CTS3.3.D.2.b.(1) and (2). CTS allow one CL header to be inoperable provided the vertical motor-driven CL is operable, but no time frame is defined within which this action is required to be completed. In the format of the ITS, some COMPLETION TIME is required to be defined for REQUIRED ACTIONS. Under the requirements of ITS LCO 3.0.6, the other train will be verified to be operable, including the OPERABILITY of the diesel driven cooling water pump on the operable header. The vertical motor driven CL pump provides added assurance that there is a safeguards pump to supply the operable header. Thus 4 hours is provided as the required time-frame in which the vertical motor driven CL pump must be verified to be operable. Since a specific time is specified, this change is more restrictive.</p>
A	047	<p>CTS 3.3.D.2.b.(1) and (2). CTS allow one CL header to be inoperable provided the horizontal CL pump is verified to be operable. These CTS actions include cross train checks, verifying support and supported relationships, and ensuring that there is not a loss of function in the CL system. Under the format and guidance of NUREG-1431, the horizontal pump will be relocated to the TRM as discussed in DOC LR3.7-43. In addition, the CTS requirements for verifying diesel generator operability and verifying the diesel driven pump operability are incorporated in LCO 3.7.8, Condition B. This change is acceptable since the CTS required actions continue to be performed. This change is consistent with the guidance of NUREG-1431. This is an Administrative change since the CTS requirements are consistent with those in the ITS.</p>

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M	048	A new SR, 3.7.8.1, is included which requires that CL valves in flow paths to safety related equipment that are not locked, sealed, or otherwise secured in position, are in the correct position. This SR is modified by a Note that clarifies that the CL system is not inoperable if the flow path to an individual component is isolated. The operability of each TS system affected by an isolated component would have to be evaluated under the TS definition of OPERABILITY. Since this SR may require additional plant activities, it is more restrictive. This more restrictive change is included to make the PI ITS complete. This change is consistent with the guidance of NUREG-1431. This change is acceptable since it may increase plant safety.
M	049	CTS3.3.D.2.c. CTS allow one Safeguards Traveling Screen to be inoperable provided a sluice gate is open but no time frame is defined within which this action is required to be completed. In the format of the ITS, some COMPLETION TIME is required to be defined for REQUIRED ACTIONS. Since there is a redundant Safeguards Traveling Screen and an inoperable Safeguards Traveling Screen may not have an immediate loss of function, four hours was selected as a reasonable time to complete this action. Since a specific time is specified, this change is more restrictive. This change is included to make the ITS complete and will maintain the plant in a safe condition.

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L	050	CTS3.3.D.1.d. NUREG-1431 allows the safeguards diesel generators to have their fuel oil supply below the required limits for 48 hours and 9 days from discovery of the failure to meet the LCO with an appropriate track for declaring them inoperable. Since NUREG-1431 assumes that all CL pumps are motor driven, similar provision is not given for the CL pumps. Consistent with the intent of NUREG-1431 for the diesel generators, the ITS allows the diesel CL pump fuel oil supply to be below limits for 48 hours and 9 days from discovery of the failure to meet the LCO with an appropriate track for declaring them inoperable. This is operational flexibility which is not provided by the CTS; thus this is a less restrictive change. Overall, these changes are considered a less restrictive change. These changes are consistent with the intent of NUREG-1431.
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M	051	CTS3.3.D.2.d. CTS allow both Safeguards Traveling Screens to be inoperable provided a sluice gate is open but no time frame is defined within which this action is required to be completed. In the format of the ITS, some COMPLETION TIME is required to be defined for REQUIRED ACTIONS. It is unlikely that both Safeguards Traveling Screens would become inoperable simultaneously; therefore when the first Safeguards Traveling Screen became inoperable the action to open the sluice gate would already have been taken and this CONDITION would likely only require administrative verification that a sluice gate had previously been opened. If both Safeguards Traveling Screens are inoperable, expeditious action is required to remedy the situation; thus one hour was selected as a reasonable time to complete this action. One hour is consistent with the time allowed in CTS 3.0.C to take action prior to shutdown when the plant is in conditions not addressed by TS. Since a specific time is specified, this change is more restrictive. This change is included to make the ITS complete and will maintain the plant in a safe condition.
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| M | 052 | CTS3.3.D.2.3. CTS allow the Emergency CL line to be inoperable provided a sluice gate connecting the emergency bay and the circulating water bay is open, but no time frame is defined within which this action is required to be completed. In the format of the ITS, some COMPLETION TIME is required to be defined for REQUIRED ACTIONS. Under the provisions of CTS 3.0.C, if this action was not completed, the plant would have 1 hour to initiate actions to shut the plant down. Therefore, 1 hour has been allowed to perform these verifications and take actions to assure these required pumps are operable. Since a specific time is specified, this change is more restrictive. This change is included to make the ITS complete and will maintain the plant in a safe condition. |
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| M | 053 | A new SR, 3.7.9.1, is included which requires verification that the safeguards travelling screens are operable. This verifications is currently performed under plant procedures. For completeness and consistency with the guidance of NUREG-1431, this verification is included as a formal SR. This SR will assure the plant is maintained in a safe condition. |

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L	054	CTS 3.13.A.1. The requirement for CRSVS operability has been revised to include MODES 1, 2, 3 and 4 and during movement of irradiated fuel. When neither unit is in one of these modes or conditions, the CRSVS is not required to perform a safety function. Design basis accidents with radiological releases are not analyzed for MODES 5 and 6. CRSVS operability during CORE ALTERATIONS is not required because: 1) borated water prevents a problem with inadvertent rod withdrawal; 2) operators have sufficient time to identify and terminate a dilution accident; and 3) while shutdown, the borated water will maintain any misloaded assembly in a safe condition. The applicability would not require the CRSVS to be operable during handling of new fuel. This is acceptable since new fuel does not contain any fission gas inventory. This change is consistent with TSTF-51. Since this change allows CRSVS inoperability during some modes, this change is less restrictive.
M	055	CTS 3.13.A.1. For consistency with NUREG-1431, the one hour to initiate actions to shut down has been deleted. This is acceptable since the Required Actions already allow time to take actions and prepare for shutdown if required.

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L	056	CTS 3.13.A.1 and 2. CRSVS operability during CORE ALTERATIONS is not required because: 1) borated water prevents a problem with inadvertent rod withdrawal; 2) operators have sufficient time to identify and terminate a dilution accident; and 3) while shutdown, the borated water will maintain any misloaded assembly in a safe condition. This change is consistent with TSTF-51. Since this change allows CRSVS inoperability during CORE ALTERATIONS, this change is less restrictive.
A	057	CTS 3.13.A.1 and 2. NUREG-1431 provides separate action statements for CRSVS during plant operation (MODES 1, 2, 3, and 4) and irradiated fuel handling operations. For clarity a new statement is included to show the changes in the CTS markup. Since this statement by itself does not change any CTS requirements, it is an administrative change.
M	058	CTS 3.13.A.1. CTS provisions which allow two hours to take actions with respect to fuel handling have been deleted since NUREG-1431 requires immediate termination of irradiated fuel handling activities. If only one train of CRSVS is inoperable, the option of placing the operable CRSVS train in service is included. Immediate termination of irradiated fuel handling and placement of the operable CRSVS train in service are acceptable since they maintain the plant in a safe condition. These changes are more restrictive since required actions are required to occur sooner.

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Discussion Of Change

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| M | 059 | A new specification, 3.7.11, is included which requires two safeguards chilled water trains to be operable. Since this new specification places additional TS requirements on the plant, this change is more restrictive. This change is acceptable because the plant currently operates this system as a support system to the CRSVS. |
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| M | 060 | New SR 3.7.8.3 requires monthly verification that the CL diesel fuel oil supply meets the required limits. CTS does not explicitly require verification of the diesel CL pump fuel oil supply; therefore, this is a more restrictive change. This change is acceptable since the plant currently checks the fuel oil supply and this will not introduce any unsafe plant operations or tests. This change is consistent with the intent of NUREG-1431 as applied to diesel generators. |
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| M | 061 | Two new SRs, 3.7.11.1 and 3.7.11.2, are included which requires verification each SCWS train actuates on an actual or simulated actuation signal and OPERABILITY of SCWS components in accordance with the ITS program. Currently the plant performs these tests. However, these SRs will make these verifications TS requirements; thus, these changes are considered more restrictive. These more restrictive changes are included to make the PI ITS complete. |

NSHD category	Change number 3.7-	Discussion Of Change
A	062	CTS 3.6.E. The CTS requirements for Auxiliary Building Special Ventilation Zone Integrity have been included in the ITS 3.7.12 requirements for the ABSVS; thus the title of this section is revised. Since all of the specification requirements are retained in the ITS, this is an administrative change.
LR	063	CTS 3.6.E.2 and 3. The details of inoperability conditions and controls for the ABSVS have been relocated to the TRM and Bases. These specification details are unnecessary since the Specification requirement for ABSVS OPERABILITY in PI ITS 3.7.12 and associated ACTIONS envelopes these requirements. A general discussion of these requirements are included in the Bases for completeness. The specific requirements are included in the TRM to assure that they are readily accessible to the operators. This change is consistent with the format and philosophy of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) and the TRM are licensee controlled, this change is less restrictive. This change is acceptable since both of these documents are under the regulatory controls of 10 CFR 50.59.

NSHD category	Change number 3.7-	Discussion Of Change
LR	064	CTS 3.6.F.1. The details of supporting equipment for operability of ABSVS have been relocated to the TRM and Bases. These specification details are unnecessary since the Specification requirement for ABSVS OPERABILITY in PI ITS 3.7.12 and associated ACTIONS envelopes these requirements. A general discussion of these requirements is included in the Bases for completeness. The specific requirements are included in the TRM to assure that they are readily accessible to the operators. This change is consistent with the format and philosophy of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) and the TRM are licensee controlled, this change is less restrictive. This change is acceptable since both of these documents are under the regulatory controls of 10 CFR 50.59.
M	065	CTS 3.6.F.2. A new action statement, consistent with the guidance of NUREG-1431, is included which addresses the situation when the allowed outage time is not met. Since the CTS does not specify an action, CTS LCO 3.0.C is applicable. This change is more restrictive since the proposed ITS action statement requires shutdown sooner than CTS LCO 3.0.C. This change does not cause the plant to be operated in an unsafe manner.

NSHD category	Change number 3.7-	Discussion Of Change
A	066	CTS 3.8.B.1.c The ITS, consistent with CTS 3.8.E.2.a, requires the boron concentration to be maintained at 1800 ppm at all times when spent fuel is stored in the spent fuel pool. Therefore the applicability is expanded beyond involving a spent fuel cask containing fuel. Since the applicability for this requirement is consistent with CTS 3.8.E.2.a, this is an administrative change. This change is consistent with other CTS requirements and does not cause the plant to operate in an unsafe manner.
LR	067	CTS 3.8.B.1.a. The CTS requirement to continuously monitor radiation levels in the SFP area during fuel handling was not included in the PI ITS. No screening criteria apply for this requirement because the process variable of the LCO is not an initial condition of a DBA or transient analysis. The SFP radiation levels only provide a secondary indication of a SFP area problem. Other ITS LCOs, such as SFP level and boron concentration, provide adequate assurance that all accident analysis assumptions are met. Since this Specification only applies during fuel handling, if an accident were to occur, the personnel stationed in the SFP area would be immediately aware of the problem. Therefore, this specification does not satisfy any of the NRC Final Policy Statement TS screening criteria and is relocated to the TRM. This change is consistent with the guidance of NUREG-1431.

NSHD category	Change number 3.7-	Discussion Of Change
LR	068	CTS 3.8.B.1.b. The requirement to test fuel handling cranes prior to fuel handling is not included in the PI ITS. No screening criteria applies for this requirement because the fuel handling crane limit switches, interlocks and alarms are not installed instrumentation that is used to detect and indicate in the control room, a significant abnormal degradation of the RCS. The crane testing requirements are not related to an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The equipment which is the subject of this specification requirement is not a part of the primary success path for mitigation of a DBA or Transient. If a fuel handling accident occurs, other plant features such as the SFP water and SFPSVS are the primary success paths. Therefore, this specification does not satisfy any of the NRC TS screening criteria and is relocated to the TRM. This change is consistent with WCAP-11618 and the guidance of NUREG-1431.
R	069	CTS 3.8.C. The CTS requirement to limit the number of recently discharged fuel assemblies stored in the small pool (Pool 1) is not included in the PI ITS. This specification does not contain requirements for installed instrumentation. This specification does not address an operating restriction that is an initial condition of a DBA or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This operating restriction on fuel storage is not a structure, system or component. Therefore, this specification does not satisfy any of the NRC Final Policy Statement TS screening criteria and is relocated to the TRM.

NSHD category	Change number 3.7-	Discussion Of Change
	070	Not used.
	071	Not used.
L	072	<p>CTS 3.8.D.2. This proposed change will delete the requirement to demonstrate operability of the redundant SFPSVS train when one train is inoperable. This change is acceptable because there is a low probability of a fuel handling accident in the 7 days that fuel movements are allowed to continue and the redundant train is required by ITS to be tested on a 31 day schedule. Further testing when one train fails is not necessary. In addition, the ITS requires in Action B that if the Required Actions and associated Completion Time of Condition A is not met then place the OPERABLE SFPSVS train in operation immediately and to also immediately suspend movement of irradiated fuel assemblies in the spent fuel pool enclosure. This change is consistent with the guidance of NUREG-1431. Since this change may require less testing, it is a less restrictive change.</p>

NSHD category	Change number 3.7-	Discussion Of Change
M	073	CTS 3.8.D.3. The CTS requirement to suspend movement of irradiated fuel is modified to require suspension "immediately". No time frame is specified in the CTS. Since a time frame is specified in the ITS, this change is more restrictive. This change is acceptable since under the CTS requirements, fuel movement would be stopped as soon as practical, which is equivalent to this new required time frame. This change is consistent with the guidance of NUREG-1431.
A	074	CTS 3.8.D.4. and 3.8.E.1.c. CTS LCO 3.0.C is equivalent to ITS LCO 3.0.3 which is referenced for clarity. Since no substantive changes are involved, this is an administrative change.
M	075	A new specification, 3.7.15, is included which requires the fuel storage pool water level to exceed 23 feet over the top of irradiated fuel seated in the storage racks during irradiated fuel movement. This change is consistent with the guidance of NUREG-1431. This new specification is acceptable since the pool level is normally kept at or above this required level during fuel movement. Since this is a formal TS requirement this change is considered more restrictive.

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| M | 076 | A new SR, 3.7.15.1, is included which requires verification of the fuel pool level during movement of irradiated fuel. Since this is a new formal TS requirement, this change is considered more restrictive. This more restrictive change is included to make the PI ITS complete. This change is consistent with the guidance of NUREG-1431. This change is acceptable since more frequent verification of the specified level as a formal requirement may increase plant safety. |
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| A | 077 | CTS 3.8.E.1. The title of this specification has been changed to be consistent with the title of ITS 3.7.17. Since no substantive changes are involved, this is an administrative change. |
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| A | 078 | CTS 3.8.E.2. The title and terminology within this specification are revised to be consistent with the title and terminology in ITS 3.7.16. Since no substantive changes are involved, this is an administrative change. |

NSHD category	Change number 3.7-	Discussion Of Change
R	079	CTS 3.12, 4.13 and Table 4.13-1. The snubber requirements in CTS 3.12 and 4.13 are relocated to the TRM. The CTS inspection and testing requirements do demonstrate the snubbers are OPERABLE. However, the ISI program, required by 10CFR50.55a, provides requirements for testing of snubbers. Prairie Island is required to comply with the provisions of 10CFR50.55a and therefore has an ISI program. This ISI program is reviewed, approved and inspected by the NRC. These controls are adequate to the required inspection and testing to demonstrate snubber operability. Therefore, PI programs and NRC regulations contain adequate requirements for snubbers without repeating them in the TS. Since the snubber requirements will be relocated to the TRM, changes will be under the controls of 10CFR50.59. This change is consistent with the guidance of NUREG-1431.
	080	Not used.

NSHD category	Change number 3.7-	Discussion Of Change
R	081	CTS Table 4.1-2A, Function 11. CTS requires periodic testing of the turbine stop valves, governor valves and intercept valves. These valve testing requirements have been relocated to the TRM. These valves are not leak detection equipment, they are not process variables, they are not a part of the primary success path for mitigation of an accident and these valves have not been found to be significant to the public health and safety. Therefore these valves do not meet the criteria of 10 CFR 50.36 for inclusion in the TS. Thus the SR for testing these valves has been relocated to the TRM. This change is consistent with the guidance of NUREG-1431. However, this change is acceptable since the TRM is under the regulatory controls of 10 CFR 50.59.
LR	082	CTS Table 4.1-1B, Functional Unit 5a and 4.7. Specific requirements for the surveillance interval for this test have been relocated to the Inservice Testing Program in accordance with the requirements of ITS Section 5.5, Inservice Testing Program. Since this test program is required by the TS, these requirements remain under regulatory controls. This change is consistent with the options given in NUREG-1431. Since this change removes specific requirements from the TS, it is a less restrictive change.

NSHD category	Change number 3.7-	Discussion Of Change
A	083	CTS 4.7. CTS requirements for testing MSIV closure time upon receipt of an actuation signal is divided into two ITS SRs as discussed in the Justification for Differences for ITS 3.7.2. Therefore another statement for this SR is included here. Since the same test is still performed that is currently required, this is an administrative change.
LR	084	CTS 4.8.A.1. In accordance with approved TSTF-101, the schedule for performing the AFW pump test is relocated to the IST program. Since the schedule is not in the TS, this is change is less restrictive. This change is acceptable since the IST program is reviewed and approved by the NRC and a test schedule which assures the operability of the AFW pumps will be specified.

NSHD category	Change number 3.7-	Discussion Of Change
L	085	<p>CTS 4.8.A.1. The CTS requirement to demonstrate full flow to the SG each refueling shutdown is not included in the ITS. This change is acceptable because the other AFW system SRs assure that full flow will reach the SGs. ITS SRs which implement CTS requirements include verification that each AFW pump develops the required head at the test flow point, verification that automatic valves actuate to the correct position on an actual or simulated signal, and verification of the flow path from the CSTs to each SG after each shutdown extending beyond 30 days. Also a new SR is included, SR 3.7.5.1, which requires verification that each valve in the AFW flow path that is not locked, sealed, or otherwise secured in position, is in the correct position. The combination of these SRs provide the necessary assurances that full AFW flow will reach the SGs. Furthermore this system is used as an operational system to feed the SGs during plant startup until the main feedwater pumps can be started (approximately 2% power); thus if AFW flow was not provided to the SGs, plant startup would not be able to proceed. Therefore this requirement is not included in the ITS. This change is consistent with the guidance of NUREG-1431.</p>

NSHD category	Change number 3.7-	Discussion Of Change
LR	086	CTS 4.8.A.3 and 4. The detailed Specification that the AFW system valves will be tested in accordance with CTS 4.2 (IST program) has not been included. ITS Section 5.5, Programs and Manuals, requires that plant components be tested in accordance with an IST program. Thus these requirements have been relocated to the IST program. This change is acceptable since the IST program is reviewed and approved by the NRC. Since these CTS requirements are not explicitly stated in the ITS, this change is less restrictive. This change is consistent with the guidance of NUREG-1431.
LR	087	CTS 4.8.A.5. The details of SR performance have been relocated to the Bases. Since the ITS requires system operability and performance of tests to demonstrate operability, the details of how the test is performed are unnecessary in the TS. This change is consistent with the format and philosophy of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive.

NSHD category	Change number 3.7-	Discussion Of Change
L	088	CTS 4.8.A.6. The CTS requirement to verify the position of valves which are locked in position is not included. Some valves in the AFW system are locked, sealed, or otherwise secured in position under administrative controls to assure that AFW flow will not be obstructed or altogether stopped. Since these locks, seals or other secure means are under administrative control, it is unnecessary to verify these valves are secured in the proper position on a regular monthly schedule. Therefore this requirement is not included. Since this change places less requirements on plant operations, it is a less restrictive change. This change is consistent with the guidance of NUREG-1431.
L	089	CTS 4.8.A.7. The CTS requirement to verify the normal AFW flow path to the SGs after each cold shutdown is not included in the PI ITS. At PI the AFW system is used for each normal unit startup and shutdown. Therefore, further documented verification is not necessary. This change is consistent with the guidance of NUREG-1431 which states, "This SR is not required by those units that use AFW for normal startup and shutdown." Since this change requires less plant testing, it is a less restrictive change.
	090	Not used.

NSHD category	Change number 3.7-	Discussion Of Change
L	091	CTS 4.8.A.8. The surveillance interval for verification of AFW system automatic actuation is increased from 18 months to 24 months to accommodate extended refueling cycles. In accordance with SR 3.0.2 this surveillance interval is fixed at this maximum and is not allowed to be extended beyond 24 months. A review of the six year period from January 1990 to the end of 1995 showed that no problems were encountered during the performance of these tests. Therefore extension of this interval up to 24 months is acceptable. This change is consistent with the guidance of GL-91-04. Since this change will allow less frequent performance of this test, this change is less restrictive. This change is consistent with the guidance of NUREG-1431.
L	092	CTS 4.8.A.8, 4.5.A.4 and 4.5.A.5. The phrase "that is not locked, sealed, or otherwise secured in position" is included to make this SR consistent with the guidance of NUREG-1431. This is acceptable, since valves that are physically and administratively secured in position will very likely be in the correct position when system performance is required. Since this may require less verification of plant equipment, this change is less restrictive.

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L 093 CTS 4.7, 4.8.A.8, 4.5.A.4, 4.5.A.5, 4.14.A.2, 4.4.B.3.c, 4.4.E and 4.15.A.2. The CTS requirement to perform this SR using a test signal has been broadened to include use of an actual signal. If the system starts due to receipt of an actual signal, this is adequate verification of system operability. Further testing within that test interval should not be required using a test signal. Therefore this change is acceptable. This change is consistent with the guidance of NUREG-1431. Since this change may require less testing, it is a less restrictive change.

The CTS requirements have also been split into two SRs for clarity. Currently, the check damper operability is verified monthly under the provisions of the CTS. Since this verification does not involve an actuation signal, this test is specified as a separate SR.

A 094 CTS 4.8.A.1, Footnote. CTS states that test shall be performed within 24 hours of entering power operation. POWER OPERATION in this context has been defined as MODE 1 in accordance with the CTS and ITS definitions. Since no substantive changes are involved, this is an administrative change.

NSHD category	Change number 3.7-	Discussion Of Change
L	095	CTS 4.8.B. The CTS Frequency for testing the SG PORVs is monthly. ITS SR 3.7.4.1 requires this SR test and Frequency to be in accordance with the IST program, which tests these valves quarterly in accordance with ASME Section XI. This is acceptable since plant experience has shown that these valves usually pass their surveillance when performed in accordance with the CTS. Thus extension of the test interval to IST requirements is justified. The testing interval for these valves remains under NRC control through NRC review and approval of the IST program. Since this change will require less testing, it is a less restrictive change.
	096	Not used.
A	097	CTS 4.5.A.4. This change includes an explicit requirement to verify that each pump starts. While this can be inferred from the CTS requirements, it is included for clarity. Since no substantive changes are involved, this is an administrative change.

NSHD category	Change number 3.7-	Discussion Of Change
LR	098	CTS 4.5.A.4.b, 4.5.A.5.a, 4.5.B.1.b, 4.5.B.1.c, 4.5.B.3.e, 4.4.B.2 and 4.4.B.3.c. The details of SR performance have been relocated to the Bases. Since the ITS requires system operability and performance of tests to demonstrate operability, the details of how the test is performed are unnecessary in the TS. This change is consistent with the format and philosophy of NUREG-1431. Since the ITS Bases (under the Bases Control Program in Section 5.5 of the ITS) are licensee controlled, this change is less restrictive.
LR	099	CTS 4.5.A.5.b. The requirements for diesel engine inspections will be relocated to the TRM and have not been included in the PI ITS. ITS 3.7.8 requires the necessary CL trains, which includes applicable pumps, to be OPERABLE. The ITS definition of OPERABILITY states, "A system, subsystem, train, component, or device shall be OPERABLE . . . when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system . . . to perform its specified safety function(s) are also capable of performing their related support functions(s)." The definition of OPERABILITY and the requirements of ITS LCO 3.7.8 are adequate for ensuring the diesel driven CL (DDCL) pump is OPERABLE. Therefore the LCO requirement for the DDCL pump to be OPERABLE mandates performance of inspections to the extent that they are required to assure operability of the pump. Thus, these requirements are relocated to the TRM. Relocating these requirements to the TRM maintains consistency with NUREG-1431.

NSHD category	Change number 3.7-	Discussion Of Change
LR	100	<p>CTS 4.4.B.3.c. CTS requires verification that the ABSVS actuates on a high radiation signal in addition to an SI signal. Following an accident, the ABSV system will be actuated by an SI signal, and therefore, actuation by the high radiation signal is not required for accident mitigation. The high radiation signal is not part of RCS leakage detection instrumentation; it is not a variable, design feature or operating restriction that is an initial condition of an accident; it is not a system, structure or component that is part of the primary success path for mitigating an accident; and it is not a structure, system or component which has been shown to be significant to the public health and safety. Thus this signal does not meet the TS Selection Criteria of 10CFR50.36 and is not included in the ITS. This requirement is relocated to the Offsite Dose Calculation Manual (ODCM). Since the ODCM is under licensee control this is a less restrictive requirement. However, this change is acceptable because the ODCM is a program required by ITS Section 5.5 and is under the regulatory controls of 10CFR50.59.</p>
L	101	<p>CTS 4.14.A and 4.15.A. The CTS requirement to test automatic initiation of this system at least every 18 months is not included. The ITS will require this system test every 24 months which will allow extension of the PI refueling outage cycle. A review of past test results for this system test showed that no problems were encountered during the performance of the test. Therefore, extension of the test to the refueling shutdown interval (up to 24 months) is acceptable.</p>

NSHD category	Change number 3.7-	Discussion Of Change
LR	102	CTS 4.14.A.1, 4.14.B, 4.4.B.3, 4.4.B.4, 4.4.B.5, 4.15.A.1, 4.15.B.1, 4.15.B.2 and 4.15.B.3. Specific details for conduct of ventilation filter tests have been relocated to the Ventilation Filter Test Program in accordance with the requirements of PI ITS Section 5.5, Ventilation Filter Test Program. Since this test program is required by the TS, these requirements remain under regulatory controls. This change is consistent with the guidance of NUREG-1431. Since this change removes specific requirements from the TS, it is a less restrictive change.
L	103	CTS 4.14.B.1.c and 4.15.B.1.c. The test interval for verification of fan performance has been extended to once per operating cycle on a STAGGERED TEST BASIS (STB). Past experience has shown that this system usually passes the fan flow test. Fan performance usually changes slowly over long periods of time which would allow prediction of unacceptable performance before a test is actually failed. Other system tests verify that the fans move air. This test verifies that the air movement is within the specified limits. If the fan fails the test, it may still move air and continue to perform most of its safety function. Therefore, extension of the interval to 24 months on an STB is acceptable. The change to 24 months is consistent with the guidance of Generic Letter 91-04. The change to an STB is consistent with the guidance of NUREG-1431. Since this change will require less testing, it is less restrictive.

NSHD category	Change number 3.7-	Discussion Of Change
M	104	CTS 4.14.B.4, 4.4.B.4.d and 4.15.B.4. "Circuit" has been replaced with "train" to be consistent with the terminology used in the ISTS. Since a train may include more equipment than a circuit, this is considered a more restrictive requirement. This change is consistent with the guidance of NUREG-1431. This change is incorporated to conform the PI ITS to the philosophy of the ISTS and make it complete.
A	105	CTS 4.4.E. The CTS requirement to test the auxiliary building normal ventilation system isolation valves is included in the requirements of SR 3.7.12.4. Since no substantive changes have been made in this clarification, this is an administrative change.

NSHD category	Change number 3.7-	Discussion Of Change
R	106	CTS 4.19. The requirements to inspect AB crane lifting devices prior to handling heavy loads is not included in the PI ITS. No screening criteria apply for this requirement because the AB crane lifting devices are not installed instrumentation that is used to detect and indicate in the control room a significant abnormal degradation of the RCS. The AB crane lifting device inspection requirements are not related to an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The equipment which is the subject of this specification requirement does not in any way mitigate the consequences of an accident and therefore is not a part of the primary success path for mitigation of a DBA or Transient. Therefore, this specification does not satisfy any of the NRC Final Policy Statement TS screening criteria and is relocated to the USAR (TRM). This change is consistent with WCAP-11618 and the guidance of NUREG-1431.
M	107	CTS 4.20. A new SR, 3.7.17.1 is included to require verification of each assembly prior to moving the assembly. This change is acceptable because this verification is currently performed in accordance with plant procedures. Since this is a new TS requirement, it is a more restrictive change. This change is consistent with the guidance of NUREG-1431.

NSHD category	Change number 3.7-	Discussion Of Change
M	108	CTS Table 4.1-2B, Item 15 and Note 5. CTS allows this surveillance to be performed every six months when the activity level is less than 10% of the limit. This change will conform this SR to NUREG-1431 SR 3.7.18.1 requirements which require the surveillance to be performed every 31 days regardless of activity level. This change is acceptable since it will not cause any unsafe plant operations or tests and the plant currently performs this testing within a 31 day frequency.
M	109	CTS 3.4.B.2.a. The CTS requirement that allows Auxiliary Feed Water equipment to be out of service for 72 hours is modified by the addition of "and 10 days from discovery of failure to meet the LCO" to be consistent with the guidance of NUREG-1431. Since this change could limit the time that AFW equipment is allowed out of service, this is a more restrictive change. This change is acceptable since it does not introduce any unsafe plant conditions.

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M 110 CTS3.3.D.2.a and 3.3.D.2.b. The CTS requirements that allow a Cooling Water (CL) pump out of service for 7 days or a CL header to be out of service for 72 hours are modified by the addition of "and 10 days from discovery of failure to meet the LCO" to be consistent with the guidance of NUREG-1431. Since this change could limit the time that CL equipment is allowed out of service, this is a more restrictive change. This change is acceptable since it does not introduce any unsafe plant conditions.

111 Not used.

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LR 112 CTS Table 4.1-2B, Items 14, 16 and Note 6. CTS requirements to sample the Secondary coolant gross Beta-Gamma activity (Item 14) and Secondary coolant chemistry (Item 16) have been relocated to the TRM. These sampling tests are not leak detection equipment, they are not process variables, they are not a part of the primary success path for mitigation of an accident and these tests have not been found to be significant to the public health and safety. Therefore these sampling tests do not meet the criteria of 10 CFR 50.36 for inclusion in the TS. Item 14 is not the subject of a TS in NUREG-1431, and since it does not meet the criteria of 10 CFR 50.36 (c)(2)(ii) it is not included in the ITS. Item 16 is related to the Secondary Water Chemistry Program in NUREG-1431 Section 5.5 and thus is not the subject of a TS in NUREG-1431. In accordance with the PI LAR dated December 14, 1995 (LA 141/132), PI does not propose to include a Secondary Water Chemistry Program in the ITS. Thus, Item 16 has been relocated to the TRM. Since the SR for these tests are not in ITS, this is a less restrictive change. However, this change is acceptable since the TRM is under the regulatory controls of 10 CFR 50.59.

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- A 113 CTS 4.5.A.4.a, 4.5.A.5.a, 4.5.B.3.e, 4.5.A.B.3.f. The CTS has been revised to change phrase "refueling outage" or "refueling shutdown" to 24 months. As a result, DOC A3.4-113 was generated to justify this change. Throughout the ITS submittal, all SRs which are intended to be performed during refueling shutdown or refueling outage interval performance have a required Frequency of 24 months. The intent of the ITS is to allow PI operating cycles to extend up to 24 months. CTS 4.0.A.2 states that SRs with a "refueling shutdown" Frequency may not be performed at an interval exceeding to 24 months. ITS SR 3.0.2 retains CTS flexibility by allowing SR testing interval to be adjusted by 25%. CTS restrictions on this flexibility have also been retained in that ITS SR 3.0.2 states, "... the specified Frequency for each SR is met, except for SRs with a specified Frequency of 24 months, if the Surveillance is performed within 0.75 to 1.25 times the interval specified" ITS SR 3.0.2 further reinforces this limitation by later stating, "The specified Frequency is met for each SR with a specified Frequency of 24 months if the Surveillance is performed within 24 months" The proposed ITS does not intend for any SRs with 24 month Frequency to exceed 24 months and thus default PI operating cycles are limited to 24 months. Since the intent of the CTS Frequencies of "refueling outage" or Refueling Shutdown are the same as the ITS, discussed above, this is considered to be an Administrative change.

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| L | 114 | CTS Table 3.5-2B, Action 27. New Note added allowing separate Condition entry for each MSIV. CTS would require entry into LCO 3.0.C when two MSIVs were inoperable at the same time. This change will allow continued plant operation with inoperabilities of both MSIVs, providing the Required Actions are met. This change is acceptable since the Required Actions assure that the safety function of the MSIVs are maintained. |
| | | |
| M | 115 | CTS 3.3.D.1.d. The CTS has been revised changing the volume of fuel oil supply required for the CL diesel from 19,000 to 19,500 gallons. Recent calculations have determined that 19,500 gallons are required to meet the design basis for the diesel driven CL pumps. This is a more restrictive change since the ITS divides the CTS diesel fuel oil volume into two separate Specifications. One Specification for the CL diesel fuel oil supply (3.7.8) and another for the diesel generator fuel oil supply (3.8.3). This change is acceptable since it envelopes the CTS fuel oil volume requirements. The two separate fuel oil volume requirements ensure there is an adequate supply of fuel oil in order for the diesel driven CL pumps to perform their intended function and at the same time not consume fuel oil required to meet the EDGs needs. |

**NSHD Change
category number
3.7-****Discussion Of Change**

- | | | |
|---|-----|--|
| M | 116 | CTS 4.8.B. A new SR has been added to manually cycle the SG PORV block valves every 24 months. The purpose of the SR is to manually cycle both PORV block valves closed and open to demonstrate their capability to perform this function. This change is considered to be a more restrictive since the CTS does not require an SR for manually cycling these block valves on a specific frequency. Adding this SR is acceptable since it ensures that the block valves will perform their intended function when required. This change is consistent with NUREG-1431. |
| | | |
| L | 117 | CTS 3.3.C.1.b. CTS states that. "any one of the following conditions of inoperability may exist . . ." This requirement prevents two or more of the listed conditions from existing at the same time to assure that there is no loss of safety function. The limitation that only one condition of inoperability may exist is not explicitly stated in ITS. In ITS, the system is treated as "trains" rather than individual components. The ITS assures there is no loss of safety function by requiring one train to be operable at all times. Multiple components within a train may be inoperable since the whole train is considered inoperable when one component is not operable. Since the ITS would allow a train, instead of individual components as in the CTS, this change is considered to be a less restrictive change. |

**NSHD Change
category number
3.7-****Discussion Of Change**

- | | | |
|------|-----|--|
| L | 118 | Add new Condition and LCO Note. The LCO note allows the control room boundary to be open intermittently under administrative control. This is acceptable since the ability to restore the boundary in the event of a DBA is always available in this condition. In addition, Condition B requires that with two CRSVS trains to be inoperable due to control room boundary in Modes 1, 2, 3, and 4, restore the control room boundary within 24 hours. Although less restrictive than the CTS, this change is applicable to PI since requiring the plant to enter LCO 3.0.3 when the ventilation envelope is not intact is excessive and not appropriate. The Completion Time of 24 hours is also acceptable since it is a reasonable time for routine repairs and due to the low probability of a DBA occurring during this time. |
|
 | | |
| M | 119 | CTS Table 3.5-2B. CTS Table 3.5-2B, Action 27 requires that if the inoperable MSIV cannot be restored to OPERABLE status within a specific time, place the unit in at least HOT SHUTDOWN and close the associated valve. There is no specific time required to close the inoperable MSIV. ITS LCO 3.7.2, Condition D has been added. This Condition requires that if the inoperable MSIV cannot be closed within 8 hours, then be in Mode 3 within 6 hours and Mode 5 within 12 hours. Since the CTS only requires that the inoperable MSIV be closed and does not require any shutdown track, this is considered to be a More Restrictive change. |

3.7 PLANT SYSTEMS

3.7.2 Main Steam Isolation Valves (MSIVs)

LCO 3.7.2 Two~~Four~~ MSIVs shall be OPERABLE.

PA3.7-114

APPLICABILITY: MODE 1,
MODES 2 and 3 except when both~~all~~ MSIVs are closed~~and~~
~~[de-activated]~~.

PA3.7-114
CL3.7-115

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MSIV inoperable in MODE 1.	A.1 Restore MSIV to OPERABLE status.	[8] hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 2.	6 hours
C. -----NOTE----- Separate Condition entry is allowed for each MSIV. ----- One or more MSIVs inoperable in MODE 2 or 3.	C.1 Close MSIV. <u>AND</u> C.2 Verify MSIV is closed.	[8] hours Once per 7 days

R-11

3.7 PLANT SYSTEMS

3.7.4 Steam Generator (SG) Power Operated Relief Valves
(PORVs) ~~Atmospheric Dump Valves (ADV)~~

CL3.7-124

LCO 3.7.4 Two SG PORVs ~~[Three]~~ ADV lines shall be OPERABLE.

CL3.7-124

APPLICABILITY: MODES 1, 2, and 3;
~~MODE 4 when steam generator is relied upon for heat removal.~~

CL3.7-125

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SG PORV required ADV line inoperable.	A.1 -----NOTE----- LCO 3.0.4 is not applicable. ----- Restore SG PORV required ADV line to OPERABLE status.	7 days
B. Two SG PORVs or more required ADV lines inoperable.	B.1 Restore one SG PORV ADV line to OPERABLE status.	241 hours

CL3.7-124

PA3.7-353

CL3.7-124

R-11

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours
	AND	
	C.2 Be in MODE 4 without reliance upon steam generator for heat removal.	12[18] hours

CL3.7-125

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.4.1 Verify one complete cycle of each SG PORVADV.	In accordance with the Inservice Testing Program[18] months
SR 3.7.4.2 Verify one complete manual cycle of each SG PORV ADV block valve.	[18]24 months

CL3.7-124
X3.7-130

X3.7-137

R-11

3.7 PLANT SYSTEMS

3.7.5 Auxiliary Feedwater (AFW) System

LCO 3.7.5 Two~~Three~~ AFW trains shall be OPERABLE.

PA3.7-127

TA3.7-136

-----NOTE-----

AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. ~~Only one AFW train, which includes a motor driven pump, is required to be OPERABLE in MODE 4.~~

R-11

CL3.7-129

APPLICABILITY: MODES 1, 2, and 3;
~~MODE 4 when steam generator is relied upon for heat removal.~~

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One steam supply to turbine driven AFW pump inoperable.</p> <p>OR</p> <p>-----NOTE----- Only applicable if MODE 2 has not been entered following refueling.</p> <p>----- One turbine driven AFW pump inoperable in MODE 3 following refueling.</p>	<p>A.1 Restore affected equipmentsteam supply to OPERABLE status.</p>	<p>7 days</p> <p>AND</p> <p>10 days from discovery of failure to meet the LCO</p> <p>TA3.7-150</p> <p>R-11</p>
<p>B. One AFW train inoperable in MODE 1, 2 or 3 [for reasons other than Condition A].</p>	<p>B.1 Restore AFW train to OPERABLE status.</p>	<p>72 hours</p> <p>AND</p> <p>10 days from discovery of failure to meet the LCO</p> <p>CL3.7-129</p> <p>R-11</p>

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.7.5.4 -----NOTES-----</p> <div style="border-left: 1px solid black; border-right: 1px solid black; padding: 5px;"> <p>1. Not required to be performed for the turbine driven AFW pump until prior to exceeding 10% RTP or within [724 hours] after RCS temperature > 350°F ≥ [1000] psig in the steam generator.</p> <p>2. AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. Not applicable in MODE 4 when steam generator is relied upon for heat removal.</p> </div> <p>-----</p> <p>Verify each AFW pump starts automatically on an actual or simulated actuation signal.</p>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">CL3.7-134</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">TA3.7-136</div> <div style="border: 1px dashed black; padding: 2px; margin-bottom: 10px;">R-11</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 10px;">X3.7-137</div> <p>24[18]months</p>
<p>SR 3.7.5.5 Verify proper alignment of the required AFW flow paths by verifying flow from the condensate storage tank to each steam generator.</p>	<div style="border: 1px solid black; padding: 2px;"> <p>Prior to entering MODE 2, whenever unit has been in MODE 5 or 6 for > 30 days</p> </div> <div style="border: 1px solid black; padding: 2px; margin-top: 10px;">PA3.7-139</div>

CSTs
3.7.6

3.7 PLANT SYSTEMS

3.7.6 Condensate Storage Tanks (CSTs)

CL3.7-141

LC0 3.7.6 The CSTs ~~level~~ shall be OPERABLE ~~≥ [110,000 gal]~~.

TA3.7-142

APPLICABILITY: MODES 1, 2, and 3,
~~MODE 4 when steam generator is relied upon for heat~~
~~removal.~~

CL3.7-143

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. CSTs inoperable level not within limit.	A.1 Verify by administrative means OPERABILITY of backup water supply. <u>AND</u> A.2 Restore CSTs level to OPERABLE status within limit.	4 hours <u>AND</u> Once per 12 hours thereafter 7 days

R-11

TA3.7-142

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4, without reliance on steam generator for heat removal.	12 [18] hours

CL3.7-143
CL3.7-144

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.6.1 Verify the CSTs useable contents level is \geq [10\pm0,000 gal] per operating unit.	12 hours

CL3.7-141

R-11

3.7 PLANT SYSTEMS

3.7.8 CoolingService Water (CL) System-(SWS)

PA3.7-146

LCO 3.7.8 Two CLSWS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. No safeguards CL pumps OPERABLE for one train.	<p>-----NOTES-----</p> <p>1. Unit 1 enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources- MODES 1, 2, 3, and 4," for emergency diesel generator made inoperable by CL System.</p> <p>2. Both units enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops-MODE 4," for residual heat removal loops made inoperable by CL System.</p>	<p>R-11</p> <p>CL3.7-147</p>

CONDITION	REQUIRED ACTION	COMPLETION TIME
	<p>3. This Condition may not exist > 7 days in any consecutive 30 day period.</p> <p>-----</p> <p>A.1 Restore one safeguards CL pump to OPERABLE status.</p>	<p>CL3.7-147</p> <p>7 days</p> <p>AND PA3.7-348</p> <p>10 days from discovery of failure to meet the LCO</p>

R-11

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>BA. One CL supply headerSWS train inoperable.</p>	<p>A.1-----NOTES-----</p> <p>1. Unit 1 eEnter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources- MODES 1, 2, 3, and 4-Operating," for emergency diesel generator made inoperable by CL SystemSWS.</p> <p>2. Both units eEnter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops-MODE 4," for residual heat removal loops made inoperable by CL SystemSWS.</p>	<div data-bbox="1354 972 1539 1020" data-label="Text"> <p>CL3.7-148</p> </div>

CONDITION	REQUIRED ACTION	COMPLETION TIME
	B.1 Verify vertical motor driven CL pump OPERABLE.	4 hours CL3.7-148
	<u>AND</u>	
	B.2 Verify opposite train diesel driven CL pump OPERABLE.	4 hours PA3.7-146
	<u>AND</u>	
	B.3 Restore CL supply headerSWS train to OPERABLE status.	72 hours <u>AND</u> PA3.7-348
		10 days from discovery of failure to meet the LCO
CB. Required Action and associated Completion Time of Condition A not met.	CB.1 Be in MODE 3.	6 hours R-11
	<u>AND</u>	
	CB.2 Be in MODE 5.	36 hours

CONDITION ACTIONS (continued)	REQUIRED ACTION	COMPLETION TIME
D. Diesel driven CL pumps stored fuel oil supply < 19,500 gal and > 17,000 gal.	D.1 Restore fuel oil supply to within limits.	48 hours <div>PA3.7-159</div> <u>AND</u> 9 days <div>PA3.7-348</div> from discov ery of failure to meet the LCO
E. Diesel driven CL pumps stored fuel oil supply < 17,000 gal. <u>OR</u> Required Action and associated Completion Time of Condition D not met.	E.1 Declare diesel driven CL pumps inoperable.	<div>PA3.7-159</div> Immediately

R-11

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.8.1 -----NOTE----- Isolation of CLSWS flow to individual components does not render the CL SystemSWS inoperable. -----</p> <p>Verify each CL SystemSWS manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>PA3.7-146</p> <p>31 days</p>
<p>SR 3.7.8.2 Verify each diesel driven CL pump starts and assumes load within one minute.</p>	<p>CL3.7-151</p> <p>31 days</p>
<p>SR 3.7.8.3 Verify stored diesel driven CL pumps fuel oil supply \geq 19,500 gal.</p>	<p>PA3.7-159</p> <p>31 days</p>
<p>SR 3.7.8.4 Verify OPERABILITY of vertical motor driven CL pump.</p>	<p>CL3.7-151</p> <p>92 days</p>

SURVEILLANCE	FREQUENCY
SR 3.7.8.52 Verify each CL SystemSWS automatic valve required to mitigate accidents in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	24 [18] months <div>CL3.7-146</div> <div>CL3.7-152</div> <div>CL3.7-116</div>
SR 3.7.8.63 Verify each the diesel driven and vertical motor driven CLSWS pumps starts automatically on an actual or simulated actuation signal.	24 [18] months <div>PA3.7-146</div> <div>CL3.7-153</div> <div>CL3.7-116</div>

R-2

R-2

3.7 PLANT SYSTEMS

3.7.9 Emergency Cooling Water (CL) SupplyUltimate Heat Sink (UHS)

CL3.7-154

CL3.7-156

CL3.7-154

LCO 3.7.9 The Emergency CL SupplyUHS shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One safeguards traveling screen inoperable.	<p>A.1 -----NOTE----- Not applicable during periods of testing for ≤ 24 hours. ----- Verify one emergency bay sluice gate open.</p> <p><u>AND</u></p> <p>A.2 Restore safeguards traveling screen to OPERABLE status.</p>	<p>CL3.7-156</p> <p>4 hours</p> <p>90 days</p>

R-11

3.7 PLANT SYSTEMS

3.7.10 Control Room Special VentilationEmergency Filtration System (CRSVEFS)

PA3.7-162

LCO 3.7.10 Two CRSVEFS trains shall be OPERABLE.

PA3.7-162

-----NOTE-----

The control room boundary may be opened intermittently
under administrative control.

TA3.7-354

R-11

APPLICABILITY: MODES 1, 2, 3, and 4, ~~[5, and 6,]~~
During movement of irradiated fuel assemblies;
~~[During CORE ALTERATIONS]~~.

CL3.7-164
TA3.7-165

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRSVEFS train inoperable.	A.1 Restore CRSVEFS train to OPERABLE status.	7 days
B. Two CRSVS trains inoperable due to inoperable control room boundary in MODES 1, 2, 3, or 4.	B.1 Restore control room boundary to OPERABLE status.	24 hours

R-11

PA3.7-162

TA3.7-354

R-11

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
BC. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	BC.1 Be in MODE 3. <u>AND</u> BC.2 Be in MODE 5.	6 hours <div data-bbox="1328 415 1523 533" style="border: 1px solid black; padding: 2px; display: inline-block;">CL3.7-166 CL3.7-164</div> 36 hours
ED. Required Action and associated Completion Time of Condition A not met [in MODE 5 or 6, or] during movement of irradiated fuel assemblies [, or during CORE ALTERATIONS].	<div data-bbox="659 659 1130 1003" style="border: 1px solid black; padding: 5px;"> <p>ED.1 <u>NOTE</u> Place in toxic gas protection mode if automatic transfer to toxic gas protection mode is inoperable.</p> </div> <p>Place OPERABLE CRSVEFS train in emergency mode.</p> <p><u>OR</u></p> <div data-bbox="659 1268 984 1461" style="border: 1px solid black; padding: 5px;"> <p>C.2.1 Suspend CORE ALTERATIONS.</p> <p><u>AND</u></p> <p>ED.2-[2] Suspend movement of irradiated fuel assemblies.</p> </div>	<div data-bbox="1234 793 1432 911" style="border: 1px solid black; padding: 2px; display: inline-block;">PA3.7-162 TA3.7-165</div> Immediately <div data-bbox="1243 1108 1442 1171" style="border: 1px solid black; padding: 2px; display: inline-block;">TA3.7-165</div> <div data-bbox="1166 1268 1425 1461" style="border: 1px solid black; padding: 5px;"> <p>Immediately</p> <p> </p> <p> </p> <p> </p> </div> Immediately

R-11

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ACTIONS	CONDITION	REQUIRED ACTION	COMPLETION TIME
DE.	Two CRSVEFS trains inoperable [in MODE 5 or 6, or] during movement of irradiated fuel assemblies [, or during CORE ALTERATIONS].	D.1 Suspend CORE ALTERATIONS. AND DE.1[2] Suspend movement of irradiated fuel assemblies.	Immediately PA3.7-162 Immediately R-11
EF.	Two CRSVEFS trains inoperable in MODE 1, 2, 3, or 4 for reasons other than Condition B.	EF.1 Enter LCO 3.0.3.	Immediately PA3.7-162 CL3.7-167 TA3.7-354 PA3.7-162 R-11

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Operate each CRSVEFS train for [≥ 10 continuous hours with the heaters operating or (for systems without heaters) ≥ 15 minutes].	31 days
SR 3.7.10.2	Perform required CRSVEFS filter testing in accordance with the [Ventilation Filter Testing Program (VFTP)].	In accordance with [VFTP]

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.7.10.3 Verify each CRSVEFS train actuates on an actual or simulated actuation signal.	24 [18] months <div data-bbox="1333 394 1526 506" style="border: 1px solid black; padding: 2px;">PA3.7-162 X3.7-137</div>
SR 3.7.10.4 Verify the one CRSVEFS fan in each train delivers 3600 to 4400 cfm ean maintain a positive pressure of \geq [0.125] inches water gauge, relative to the adjacent [turbine building] during the pressurization mode of operation at a makeup flow rate of \leq [3000] cfm.	24 [18] months on a STAGGERED TEST BASIS <div data-bbox="1333 758 1526 869" style="border: 1px solid black; padding: 2px;">CL3.7-168 X3.7-137</div>

3.7 PLANT SYSTEMS

3.7.11 Safeguards Chilled Water System (SCWS) ~~Control Room Emergency Air Temperature Control System (CREATCS)~~

PA3.7-169

LCO 3.7.11 Two SCWS ~~CREATCS~~ loopstrains shall be OPERABLE.

PA3.7-169

APPLICABILITY: MODES 1, 2, 3, and 4, ~~[5, and 6,]~~
During movement of irradiated fuel assemblies,
~~[During CORE ALTERATIONS].~~

PA3.7-171
TA3.7-165

ACTIONS

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CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SCWS CREATCS looptrain inoperable.	A.1 Restore SCWS CREATCS looptrain to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, 3, or 4.	B.1 Be in MODE 3. <u>AND</u> B.2 Be in MODE 5.	6 hours 36 hours

PA3.7-171

PA3.7-169

3.7 PLANT SYSTEMS

3.7.12 Auxiliary Building Special VentilationEmergency Core Cooling
System (ECCS) Pump Room Exhaust Air CleanupSystem
(ABSVSPREACS)

PA3.7-172

LCO 3.7.12 Two ABSVSECCS-PREACS trains shall be OPERABLE.

-----NOTE-----

The ABSV boundary may be opened under
administrative control.

PA3.7-172

CL3.7-174

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One ABSVSECCS-PREACS train inoperable.	A.1 Restore ABSVSECCS PREACS train to OPERABLE status.	7 days
B. Two ABSVS trains inoperable due to inoperable ABSVS boundary.	B.1 Restore ABSVS boundary to OPERABLE status.	24 hours
C.B Required Action and associated Completion Time not met.	CB.1 Be in MODE 3. <u>AND</u> CB.2 Be in MODE 5.	6 hours 36 hours

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PA3.7-172

CL3.7-174

CL3.7-177

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.12.1 Operate each ABSVSECCS PREACS train for [≥ 10 continuous hours with the heaters operating or (for systems without heaters) ≥ 15 minutes] .	31 days
SR 3.7.12.2 Perform required ABSVSECCS PREACS filter testing in accordance with the [Ventilation Filter Testing Program (VFTP)].	In accordance with the [VFTP] <div data-bbox="1339 740 1538 859">PA3.7-172 CL3.7-175</div>
SR 3.7.12.43 Verify each ABSVSECCS PREACS train actuates on an actual or simulated actuation signal.	24[18] months <div data-bbox="1351 1012 1549 1072">PA3.7-172</div>
SR 3.7.12.34 Verify eachone ABSVSECCS PREACS train can produce maintain a negative pressure within 6 minutes after initiation ≤ [-0.125] inches water gauge relative to atmospheric pressure during the [post accident] mode of operation at a flow rate of ≤ [3000] cfm.	92 days[18] months on a STAGGERED TEST BASIS <div data-bbox="1328 1229 1526 1349">PA3.7-172 X3.7-137</div>
<div data-bbox="211 1519 261 1638">[</div> SR 3.7.12.5 Verify each ECCS PREACS filter bypass damper can be closed. <div data-bbox="211 1638 261 1647">]</div>	<div data-bbox="1367 1476 1559 1561">PA3.7-172 CL3.7-176</div> <div data-bbox="1191 1540 1356 1574">[18] month</div> <div data-bbox="1191 1583 1356 1613">s</div>

PA3.7-201

BASES

ACTIONS B.1 and B.2
~~(continued)~~

~~conditions of the valve at nominal operating temperature and pressure.~~

LCO
(continued) This LCO provides assurance that the MSSVs will perform their designed safety functions to mitigate the consequences of accidents that could result in a challenge to the RCPB or Main Steam System integrity.

TA3.7-202

APPLICABILITY In MODES 1, 2, and 3 ~~above 40% RTP, the number of~~ effective MSSVs per steam generator are required to be OPERABLE to prevent Main Steam System overpressurization. ~~must be according to Table 3.7.1-1 in the accompanying LCO. Below 40% RTP in MODES 1, 2, and 3, only two MSSVs per steam generator are required to be OPERABLE.~~

TA3.7-202

In MODES 4, ~~and 5~~, and 6, there are no credible transients requiring the MSSVs.

PA3.7-207

The energy content in the steam generators is sufficiently low ~~are not normally used for heat removal in MODES 5 and 6, and thus that they cannot be overpressurized; there is no requirement for the MSSVs to be OPERABLE in these MODES.~~

ACTIONS ~~The ACTIONS table is modified by a Note indicating that separate Condition entry is allowed for each MSSV.~~

CL3.7-112

A.1

With one ~~or more~~ MSSVs inoperable, ~~reduce power~~ restore OPERABILITY of the inoperable MSSV within 4 hours. The 4 hours is a reasonable time due to the low probability of an event or transient occurring during this time requiring MSSV operation. ~~so that the available MSSV relieving capacity meets Reference 2 requirements for the applicable THERMAL POWER.~~

CL3.7-111

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BASES

on operating experience, to reach MODE 2 and to close the MSIVs in an orderly manner and without challenging unit systems.

C.1 and C.2

Condition C is modified by a Note indicating that separate Condition entry is allowed for each MSIV.

Since the MSIVs are required to be OPERABLE in MODES 2 and 3, the inoperable MSIVs may either be restored to OPERABLE status or closed. When closed, the MSIVs are already in the position required by the assumptions in the safety analysis.

R-11

ACTIONS C.1 and C.2 (continued)

The [8] hour Completion Time is consistent with that allowed in Condition A for one MSIV inoperable.

For an inoperable MSIVs that cannot be restored to OPERABLE status within the specified Completion Time, but is are closed, the inoperable MSIVs must be verified on a periodic basis to be closed. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of MSIV status indications available in the control room, and other administrative controls, to ensure that these valves are in the closed position.

D.1 and D.2

If the MSIVs cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in

(continued)

APPLICABILITY In MODES 1, 2, and 3, ~~and in MODE 4, when a steam generator is being relied upon for heat removal,~~ the SG PORVsADV are required to be OPERABLE.

CL3.7-125

In MODE 4, a steam generator and the SG PORV are not relied upon for heat removal.

In MODE 5 or 6, an SGTR is not a credible event.

ACTIONS A.1

With one required SG PORVADV ~~line~~ inoperable, action must be taken to restore OPERABLE status within 7 days.

The 7 day Completion Time allows for the redundant capability afforded by the remaining OPERABLE SG PORVADV ~~lines, a nonsafety grade backup in the Steam DumpBypass System, and MSSVs.~~

Required Action A.1 is modified by a Note indicating that LCO 3.0.4 does not apply.

B.1

With two ~~or more~~ SG PORVsADV ~~lines~~ inoperable, action must be taken to restore ~~all but one~~ SG PORVADV ~~line~~ to OPERABLE status. Since the block valve can be closed to isolate an SG PORVADV, some repairs may be possible with the unit at power.

The ~~241~~ hour Completion Time allows time to plan an orderly shutdown of the unit and is reasonable ~~to repair inoperable ADV lines,~~ based on the availability of the Steam Dump Bypass System and MSSVs, and the low probability of an event occurring during this period that would require the SG PORVADV ~~lines.~~

PA3.7-353

R-11

SR 3.7.4.2

X3.7-137

The function of the block valve is to isolate a failed open ADVSG PORV. Manually cycling the block valve both closed and open demonstrates its capability to perform this function. Performance of inservice testing or use of the block valve during unit cooldown may satisfy this requirement.

Operating experience has shown that these components usually pass the Surveillance when performed ~~at the [18] month~~ Frequency. The Frequency is acceptable from a reliability standpoint.

R-11

REFERENCES

1. UFSAR, Section 11.4~~[10.3]~~.
2. USAR, Section 14.

BASES

Two~~[Three]~~ independent AFW pumps in two~~[three]~~ diverse trains are required to be OPERABLE to ensure the availability of decay heat removal~~RHR~~ capability for all events accompanied by a loss of offsite power main feedwater and a single failure.

CL3.7-251

~~This is accomplished by powering two of the pumps from independent emergency buses.~~

~~The third AFW pump is powered by a different means, a steam driven turbine supplied with steam from a source that is not isolated by closure of the MSIVs.~~

~~The AFW System is configured into [three] trains.~~

The AFW System is considered OPERABLE when the components and flow paths required to provide redundant AFW flow to the steam generators are OPERABLE. This requires that the ~~one~~two motor driven AFW pumps be OPERABLE and capable of in ~~[two]~~ diverse paths, each supplying AFW to both separate steam generators. The turbine driven AFW pump is required to be OPERABLE with redundant steam supplies from each of ~~[two]~~ main steam lines upstream of the MSIVs, and shall be capable of supplying AFW to both~~any of the~~ steam generators. The piping, valves, instrumentation, and controls in the required flow paths, required for the system to perform the safety related function, also are required to be OPERABLE. The normal (Condensate Storage Tanks (CSTs)) and backup (Cooling Water System) water supplies to the AFW pumps must also be OPERABLE. OPERABILITY requirements for the CSTs are specified in LCO 3.7.6, "Condensate Storage Tanks (CSTs)."

CL3.7-251

PA3.7-255

The LCO is modified by a Note indicating that ~~one~~an AFW train, which includes a motor driven pump, is required to may be considered OPERABLE

TA3.7-136

R-11

BASES

- a. For the inoperability of a steam supply to the turbine driven AFW pump, ~~t~~The 7 day Completion Time is reasonable since there is a redundant ~~OPERABLE~~ steam supply line for ~~to~~ the turbine driven AFW pump; TA3.7-150
- b. For the inoperability of a turbine driven AFW pump while in MODE 3 immediately subsequent to a refueling outage, the 7 day Completion Time is reasonable due to the minimal decay heat levels in this situation~~The availability of redundant OPERABLE motor driven AFW pumps; and~~ TA3.7-150
- c. For both the inoperability of a steam supply line to the turbine driven pump and an inoperable turbine driven AFW pump while in MODE 3 immediately following a refueling outage, the 7 day Completion Time is reasonable due to the availability of the redundant OPERABLE motor driven AFW pump, and due to ~~t~~The low probability of an event ~~occurring that requires the use of inoperable steam supply to the turbine driven AFW pump.~~ TA3.7-150

~~ACTIONS~~ A.1 (continued)

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

R-11

BASES

Condition A is modified by a Note which limits the applicability of the Condition when the unit has not entered MODE 2 following a refueling. Condition A allows one AFW train to be inoperable for 7 days vice the 72 hour Completion Time in Condition B. This longer Completion Time is based on the reduced decay heat following refueling and prior to the reactor being critical.

TA3.7-150

B.1

R-11

With one of the required AFW trains (pump or flow path) inoperable in ~~MODE 1, 2, or 3~~ [for reasons other than Condition A], action must be taken to restore OPERABLE status within 72 hours. This Condition includes the loss of two steam supply lines to the turbine driven AFW pump. The 72 hour Completion Time is reasonable, based on redundant capabilities afforded by the AFW System, time needed for repairs, and the low probability of a DBA occurring during this time period.

CL3.7-129

The second Completion Time for Required Action B.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 72 hours and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

R-11

BASES (continued)

control, if it is capable of being manually (i.e., remotely or locally, as appropriate) realigned to the AFW mode of operation, provided it is not otherwise inoperable. This exception allows the system to be out of its normal standby alignment and temporarily incapable of automatic initiation without declaring the train(s) inoperable. Since AFW may be used during MODES 2, 3 and 4 operations for steam generator level control, and these manual operations are an accepted function of the AFW system, OPERABILITY (i.e., the intended safety function) continues to be maintained ~~the SR is not required in MODE 4. In MODE 4, the required AFW train is already aligned and operating.~~

SR 3.7.5.4

This SR verifies that the AFW pumps will start ~~in the event of any accident or transient that generates an ESFA~~ when required by demonstrating that each AFW pump starts automatically on an actual or simulated AFW pump start actuation signal ~~in MODES 1, 2, and 3. In MODE 4, the required pump is already operating and the autostart function is not required.~~ Since this test is performed during unit shutdown, the turbine driven AFW pump is not actually started, but the components necessary to assure it starts on an actual or simulated AFW pump start signal are demonstrated to be OPERABLE. This test is considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly. The 24 ~~[18]~~ month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power.

PA3.7-255

X3.7-137

This SR is modified by ~~[a]~~ ~~[two]~~ Note[s].-
[Note

CL3.7-134

R-11

BASES

1 indicates that the SR be deferred until suitable test conditions are established. This deferral is required because there is insufficient steam pressure to perform the test.] CL3.7-134
CL3.7-138
 [The] Note [2] states that one or more AFW trains may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually (i.e., remotely or locally, as appropriate) realigned to the AFW mode of operation, provided it is not otherwise inoperable. TA3.7-136
 This exception allows the system to be out of its normal standby alignment and temporarily incapable of automatic initiation without declaring the train(s) inoperable. Since AFW may be used during MODES 2, 3 and 4 operations for steam generator level control, and these manual operations are an accepted function of the AFW system, OPERABILITY (i.e., the intended safety function) continues to be maintained the SR is not required in MODE 4. R-11
 [In MODE 4, the required pump is already operating and the autostart function is not required.] [In MODE 4, the heat removal requirements would be less providing more time for operator action to manually start the required AFW pump.]

SURVEILLANCE
— REQUIREMENTS

SR 3.7.5.4 (continued)

~~Reviewer's Note: Some plants may not routinely use the AFW for heat removal in MODE 4. The second justification is provided for plants that use a startup feedwater pump rather than AFW for startup and shutdown.~~

SR 3.7.5.5

~~This SR verifies that the AFW is properly aligned by verifying the flow paths from the CST to each steam generator prior to entering MODE 2 after more than 30 days in MODE 5 or 6. OPERABILITY of AFW flow paths must be verified before sufficient core heat is generated that would require the operation of the~~

PA3.7-139

B 3.7 PLANT SYSTEMS

PA3.7-201

B 3.7.6 Condensate Storage Tanks (CSTs)

CL3.7-141

BASES

BACKGROUND

Three 150,000 gallon CSTs (total) are shared via a common header between the 2 units. Unit 1 has 1 tank (11) and Unit 2 has 2 tanks (21 and 22). The CSTs provides a nonsafety grade source of water to the steam generators for removing decay and sensible heat from the Reactor Coolant System (RCS).

CL3.7-254

R-11

A backup safety grade source of water is provided by the safety-related portion of the Cooling Water (CL) System (LCO 3.7.8) via either the Emergency Cooling Water Line or the emergency bay sluice gates.

Since water supplied from the CL System is of lower purity, its use is considered less desirable under normal conditions than the higher purity condensate water from the CSTs. However, if needed, the operator can lineup the Cooling Water supply by opening the associated CL supply motor operated valve (MOV) and closing the associated CST supply MOV for each auxiliary feedwater pump.

CL3.7-254

The CSTs provides a passive flow of water, by gravity, to the Auxiliary Feedwater (AFW) System (LCO 3.7.5). The steam produced is released to the atmosphere by the main steam safety valves, ~~or~~ the steam generator power operated relief valves or the atmospheric dump valves. Each ~~The~~ AFW pumps operates with a continuous recirculation to ~~a~~ the CST.

PA3.7-247

When the main steam isolation valves are open, the preferred means of heat removal is to discharge steam to the condenser by the nonsafety grade path of the steam dump ~~bypass~~ valves. The condensed steam ~~is~~ may be returned to the CSTs by the

(continued)

PA3.7-201

CL3.7-141

BASES

~~(requiring additional steam to drive the remaining AFW pump turbine); and~~

- b. ~~Failure of the steam driven AFW pump (requiring a longer time for cooldown using only one motor driven AFW pump).~~

~~These are not usually the limiting failures in terms of consequences for these events.~~

~~A nonlimiting event considered in CST inventory determinations is a break in either the main feedwater or AFW line near where the two join. This break has the potential for dumping condensate until terminated by operator action, since the Emergency Feedwater Actuation System would not detect a difference in pressure between the steam generators for this break location. This loss of condensate inventory is partially compensated for by the retention of steam generator inventory.~~

~~The 100,000 gallon CSTs useable volume requirement for each unit in MODE 1, 2, or 3 is sufficient to:~~

CL3.7-256

- a. ~~Remove the decay heat generated by one reactor in the first 12 hours after shutdown;~~
- b. ~~Ensure sufficient water is available to cool down a reactor from 547°F to 350°F using natural circulation at 25°F/hour; or~~
- c. ~~Ensure sufficient water is available to hold the unit in Mode 3 for 2 hours, followed by a cooldown to RHR entry conditions within the next 6 hours.~~

~~These calculations take into account the decay heat and reactor coolant system stored energy. (Ref. 1)~~

~~The CST satisfies Criteria 2 and 3 of 10 CFR 50.36 (c)(2)(ii) the NRC Policy Statement.~~

TA3.7-142

R-11

(continued)

BASES

LCO

~~To satisfy accident analysis assumptions, the CST must contain sufficient cooling water to remove decay heat for [30 minutes] following a reactor trip from 102% RTP, and then to cool down the RCS to RHR entry conditions, assuming a coincident loss of offsite power and the most adverse single failure. In doing this, it must retain sufficient water to ensure adequate net positive suction head for the AFW pumps during cooldown, as well as account for any losses from the steam driven AFW pump turbine, or before isolating AFW to a broken line.~~

The CSTs are considered OPERABLE when the CSTs' contents have at least 100,000 gallons useable per operating unit (MODES 1, 2, or 3).

CL3.7-257

R-11

~~The CST level required is equivalent to a usable volume of \geq [110,000 gallons], which is based on holding the unit in MODE 3 for [2] hours, followed by a cooldown to RHR entry conditions at [75]°F/hour. This basis is established in Reference 24 and exceeds the volume required by the accident analysis.~~

LCO

(continued)

The OPERABILITY of the CSTs is determined by maintaining the tank level at or above the minimum required level.

APPLICABILITY

In MODES 1, 2, and 3, and in MODE 4, when steam generator is

CL3.7-143

(continued)

BASES

~~being relied upon for heat removal, the CSTs are is~~
required to be OPERABLE.

In MODES 4, 5 or 6, the CSTs are ~~is not~~ required because the AFW System is not required.

ACTIONS

A.1 and A.2

R-11

If the CSTs are not OPERABLE (e.g., level is not within limits), the OPERABILITY of the backup safety-related portion of the CL supply should be verified by administrative means within 4 hours and once every 12 hours thereafter. OPERABILITY of the backup safety-related portion of the CL ~~feedwater~~ supply must include verification that the flow paths from the backup water supply to the AFW pumps are OPERABLE in accordance with LCO 3.7.8., ~~and that the backup supply has the required volume of water available.~~ The CSTs must be restored to OPERABLE status within 7 days, ~~because the backup supply may be performing this function in addition to its normal functions.~~

TA3.7-142

PA3.7-261

The 4 hour Completion Time is reasonable, based on operating experience, to verify the OPERABILITY of the backup safety-related portion of the Cooling Wwater supply. Additionally, verifying the backup water supply every 12 hours is adequate to ensure the backup water supply continues to be available. The 7 day Completion Time is reasonable, based on an OPERABLE backup safety-related

TA3.7-262

(continued)

BASES (continued)

portion of the CLwater supply being available, and the low probability of an event occurring during this time period requiring the CSTs.

B.1 and B.2

If the CSTs cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply.

To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4, without reliance on the steam generator for heat removal, within 12~~[18]~~ hours.

CL3.7-144

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTSSR 3.7.6.1

This SR verifies that the CSTs contains the required useable volume of cooling water. ~~—(The required CST volume may be single value or a function of RCS conditions.)—~~

R-11

The 12 hour Frequency is based on operating experience and the need for operator awareness of unit evolutions that may affect the CST inventory between checks.

Also, the 12 hour Frequency is considered adequate in view of other indications in the control room, including alarms, to alert the operator to abnormal deviations in the CST level.

PA3.7-146

PA3.7-201

BASES

OPERABILITY of the equipment serviced by the CLSWS System and required to be OPERABLE in these MODES.

In MODES 5 and 6, the OPERABILITY requirements of the CL System areSWS are determined by the systems it supports.

ACTIONS

A.1

If no safeguards CL pumps are OPERABLE for one train, action must be taken to restore one CL safeguards pump to OPERABLE status within 7 days.

CL3.7-147

Either the diesel driven CL pump for the train may be restored to OPERABLE status, or the 121 CL pump may be aligned to fulfill the safeguards function for the train that has no OPERABLE safeguards CL pump.

The 7 day Completion Time is based on:

- a. Low probability of loss of offsite power during the period;
- b. The low probability of a DBA occurring during this time period;
- c. The safeguards cooling capabilities afforded by the remaining OPERABLE train; and
- d. The capability to route water from the non-safeguards pumps, if needed.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for combinations of Conditions A and B to be inoperable during any continuous failure to meet this LCO for these Conditions.

PA3.7-348

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered

R-11

(continued)

PA3.7-146

PA3.7-201

BASES

reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

PA3.7-348

Required Action A.1 is modified by 3 notes. Note 1 requires Unit 1 entry into the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources – Operating," for an emergency diesel generator made inoperable by the CL system. For Unit 1, the diesel generators are major heat loads supplied by the CL system. Thus, inoperability of two safeguards CL pumps will affect at least the heat loads on one CL header, including one Unit 1 diesel generator. Inability to adequately remove the heat from the diesel generator will render it inoperable.

R-11

Note 2 requires entry into the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4", for both units for the RHR loops made inoperable by the CL System. If either unit is in MODE 4, inoperability of two safeguards CL pumps may affect all the heat loads on one CL header, including a CC train and subsequently one RHR heat exchanger on each unit. Inability to adequately remove the heat from a RHR heat exchanger will render it inoperable.

CL3.7-147

Note 3 specifies that the Condition with no safeguard CL pumps OPERABLE for one train may not exist for more than 7 days in any consecutive 30 day period. If such a condition occurs, Condition C must be entered with the specified Required Action taken because the equipment reliability is less than considered acceptable.

(continued)

PA3.7-146

PA3.7-201

BASES

ACTIONS

BA.1,B.2 and B.3

CL3.7-148

If one CLSWS supply headertrain is inoperable, action must be taken to verify the vertical motor driven CL pump and the opposite train diesel driven CL pump are OPERABLE within 4 hours, and restore the inoperable CL header to OPERABLE status within 72 hours.

Verification of vertical motor driven CL pump OPERABILITY does not require the pump to be aligned and may be performed by administrative means. Verification of the opposite train diesel driven CL pump may be performed by administrative means. Completion of the CL pump surveillance tests is not required.

R-11

Conditions may occur in the CL System piping, valves, or instrumentation downstream of the supply header (e.g., closed or failed valves, failed piping, or instrumentation in a return header) that can result in the supply header being considered inoperable. In such cases, Condition B and related Required Actions shall apply.

In this Condition, the remaining OPERABLE CLSWS headertrain is adequate to perform the heat removal function. However, the overall redundancyreliability is reduced because only a single CL train remainsfailure in the OPERABLE SWS train could result in loss of SWS function.

Required Action B.1 ensures that the vertical motor driven 121 CL pump may be used to provide redundancy for the safeguards CL pump on the OPERABLE header.

CL3.7-148

Required Action

B.3 assures adequate system reliability is maintained.

The second Completion Time for Required Action B.3 establishes a limit on the maximum time allowed for combinations of Conditions A and B to be inoperable during

R-11

(continued)

PA3.7-146

PA3.7-201

BASES

PA3.7-348

any continuous failure to meet this LCO for these Conditions.

The 10 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 10 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

Required Actions BA.1 B.2 and B.3 are modified by two Notes.

The first Note indicates that the applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources – Operating," should be entered for Unit 1 since if an inoperable CLSWS train results in an inoperable emergency diesel generator.

R-11

The second Note indicates that the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops – MODE 4," should be entered if an inoperable CLSWS train results in an inoperable decay heat removal train. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

The 4 and 72 hour Completion Times are based on the redundant capabilities afforded by the OPERABLE train, and the low probability of a DBA occurring during this time period. In addition, the 4 hour Completion Time for Required Actions B.1 and B.2 is within the time period anticipated to verify OPERABILITY of the required CL pump by administrative means.

CB.1 and CB.2

If ~~the~~ at least one safeguards CLSWS pump for a train or a CL supply header cannot be restored to OPERABLE status within the associated Completion Time, the units must be

(continued)

PA3.7-146

PA3.7-201

BASES

placed in a MODE in which the LCO does not apply. To achieve this status the units must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

R-11

D.1

In this Condition, the 14 day fuel oil supply for the diesel driven CL pumps is not available. However, the Condition is restricted to fuel oil supply reductions that maintain at least a 12 day supply. This restriction allows sufficient time for obtaining the requisite replacement volume and performing the analyses required prior to addition of fuel oil to the tank(s). A period of 48 hours is considered sufficient to complete restoration of the required supply prior to declaring the diesel driven CL pumps inoperable. This period is acceptable based on the remaining 12 day fuel oil supply, the fact that procedures will be initiated to obtain replenishment, availability of the vertical motor driven CL pump and the low probability of an event during this brief period.

PA3.7-159

The second Completion Time for Required Action D.1 establishes a limit on the maximum time allowed for combinations of Conditions A and D to be inoperable during any continuous failure to meet this LCO for these Conditions.

PA3.7-348

The 9 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for situations in which Conditions A and D are entered

R-11

(continued)

PA3.7-146

PA3.7-201

BASES

PA3.7-348

concurrently. The AND connector between 48 hours and 9 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

R-11

E.1

With the stored fuel oil supply not within the limits specified or Required Actions and associated Completion Times of Condition D not met, the diesel driven CL pumps may be incapable of performing their intended function and must be immediately declared inoperable.

PA3.7-159

SURVEILLANCE
REQUIREMENTSSR 3.7.8.1

This SR is modified by a Note indicating that the isolation of the CL SystemSWS components or systems may render those components inoperable, but does not affect the OPERABILITY of the CL SystemSWS.

This SR verifies~~Verifying~~ the correct alignment for manual, power operated, and automatic valves in the CL SystemSWS flow path to~~provides~~ assurance that the proper flow paths exist for CL SystemSWS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to being locked, sealed, or secured. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. Control room indication may be used to fulfill this SR.

PA3.7-272

(continued)

PA3.7-146

PA3.7-201

BASES

This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

CL3.7-151

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

SR 3.7.8.2

This SR verifies each diesel driven CL pump can be started and be up to operating speed and assumes load within one minute to provide assurance that equipment would perform as expected in the safety analysis.

Diesel CL pump start will normally be initiated by the manual start switch. Once per calendar year, start should be initiated by use of the low pressure header pressure switch.

The 31 day Frequency is based on the experience that the CL pump usually passes the Surveillance when performed at this Frequency.

SR 3.7.8.3

This SR provides verification that there is an adequate inventory of fuel oil in the storage tanks to support the operation of one diesel driven CL pump for 14 days. The 14 day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location.

PA3.7-159

The specified fuel oil inventory for the diesel cooling water pumps is in addition to the fuel oil inventory specified for the Unit 1 emergency diesel generators (EDGs) (LCO 3.8.3) that must be available in the Unit 1 diesel fuel oil storage system. There are four Design Class I fuel oil storage tanks for the Unit 1 EDGs and two Design Class I fuel oil storage tanks for the diesel driven cooling water pumps. These six Design Class

CL3.7-160

R-8

(continued)

PA3.7-146

PA3.7-201

BASES

I tanks are interconnected such that any tank can be manually aligned to supply any Unit 1 EDG or diesel driven cooling water pump day tank. Any combination of inventory in these six tanks may be used to satisfy the inventory requirements for the diesel driven cooling water pumps and the Unit 1 EDGs. Since the fuel oil for the CL pumps comes from the common fuel oil tanks shared by the Unit 1 diesel generators, the testing and the quality of the fuel oil is controlled by Technical Specification 5.5.11, "Diesel Fuel Oil Testing Program."

The 31 day Frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and plant operators would be aware of any large uses of fuel oil during this period.

R-11

SR 3.7.8.4

This SR verifies the vertical motor driven CL pump is OPERABLE to provide assurance that equipment, when lined up in the safeguards mode, will perform as expected in the safety analysis.

CL3.7-151

For this test, an acceptable level of performance shall be:

- a. Pump starts and reaches required developed head; and
- b. Control board indications and visual observations indicate that the pump is operating properly for at least 15 minutes.

The 92 day Frequency is based on the Inservice Testing Program requirements (Ref. 3).

Under some plant conditions, the vertical motor driven CL pump is required to operate to provide additional CL flow. When this pump is operated to support plant operations, this test can not be performed and this pump is considered inoperable as a safeguards CL pump.

CL3.7-151

SR 3.7.8.5

(continued)

PA3.7-146

PA3.7-201

BASES

This SR verifies proper automatic operation of the CL SystemSWS valves on an actual or simulated safety injection actuation signal, including

CL3.7-282

those valves that isolate non-essential equipment from the system. The CL SystemSWS is a normally operating system that is shared between the two units and cannot be fully actuated as part of normal testing. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls.

These tests demonstrate the operation of the valves, pump circuit breakers, and automatic circuitry.

CL3.7-282

Unit 1 SI actuation circuits for Train A and Train B valves shall be tested during Unit 1 refueling outages. Unit 2 SI actuation circuits for Train A and Train B valves shall be tested during Unit 2 refueling outages.

A test is considered satisfactory if control board indication and visual observations indicate that all components have operated satisfactorily and if cooling water flow paths required for accident mitigation have been established.

The 24~~[18]~~ month Frequency is based on the need to perform this Surveillance under the conditions that apply during an unit outage of one unit (the other unit may be operating) and the potential for an unplanned transient in the unit affected by the tested components if the Surveillance were performed with that the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the ~~[18]~~ month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

CL3.7-116

R-2

SR 3.7.8.6

The safeguards CL pumps may be actuated by either a safety injection (SI) signal or system low pressure. This SR verifies proper automatic operation of the diesel driven and vertical motor driven CLSWS pumps on an actual or simulated safety injection actuation signal and verifies proper automatic operation of these pumps on an actual or simulated

CL3.7-153

CL3.7-283

CL3.7-282

(continued)

PA3.7-146

PA3.7-201

BASES

low pressure actuation signal. The CLSWS is a normally operating system that cannot be fully actuated in a safeguards mode as part of normal testing during normal operation. A test is considered satisfactory if control board indication and visual observations indicate that all components have operated satisfactorily.

The 24~~[18]~~ month Frequency is based on the need to perform the SI signal portion of this Surveillance under the conditions that apply during a unit

CL3.7-116

R-2

~~Sr 3.7.8.3~~ (continued)

outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at the ~~[18]~~ month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

REFERENCES

1. UFSAR, Section 10.4~~[9.2.1]~~.
 2. UFSAR, Section 6~~[6.2]~~.
 3. ~~FSAR, Section [5.4.7]~~. ASME Boiler and Pressure Vessel Code, Section XI.
-
-

(continued)

PA3.7-201

CL3.7-154

BASES (continued)

~~should not fall below [562 ft mean sea level] during normal unit operation.~~

Both safeguards traveling screens are required to be OPERABLE. A safeguards traveling screen is CL3.7-287 considered OPERABLE when:

- a. The valve, instrumentation and controls required to provide the screen backwash function are OPERABLE; and
- b. The safeguards traveling screen can turn.

Safeguards traveling screen OPERABILITY is not required for OPERABILITY of the safeguards CL pumps (LCO 3.7.8).

The Emergency CL Line is OPERABLE when a flow path through the pipe exists.

APPLICABILITY With either unit iIn MODES 1, 2, 3, and 4, the UHSSafeguards Traveling Screens and Emergency CL Line areis required to support the OPERABILITY of the equipment serviced by the CL System during the design basis conditionUHS and required to be OPERABLE in these MODES.

With both units iIn MODE 5 or 6, the OPERABILITY requirements of the Emergency CL SupplyUHS are determined by the systemsit supports. The design basis does not include shutdown conditions.

ACTIONS

R-11

(continued)

PA3.7-201

CL3.7-154

BASES (continued)

A.1 and A.2

R-11

If one safeguards traveling screen is inoperable, action must be taken to verify an emergency bay sluice gate is open within 4 hours, and restore that safeguards traveling screen to OPERABLE status within 90 days.

CL3.7-156

In this Condition, the remaining OPERABLE safeguards traveling screen or open emergency bay sluice gate is adequate to provide the CL supply to any of the three vertical CL pumps during any design basis condition.

Required Action A.1 is modified by a Note which states the action is not required during testing periods of less than or equal to 24 hours.

R-11

traveling

The 4 hour Completion Time is based on the redundant capability afforded by the OPERABLE safeguards screen.

The 90 day Completion Time is based on:

- a. The redundant capability afforded by the remaining OPERABLE safeguards traveling screen;
- b. The low risk impact of an inoperable safeguards traveling screen; and
- c. The low probability of a high magnitude earthquake that could destroy Dam No. 3 during this time interval.

(continued)

PA3.7-201

CL3.7-154

BASES (continued)

ACTIONS

B.1 and B.2

If both safeguards traveling screens are inoperable, action must be taken to verify one emergency bay sluice gate is open within 1 hour, and restore one safeguards traveling screen to OPERABLE status within 7 days.

CL3.7-156

In this Condition, the open emergency bay sluice gate is adequate to perform the CL supply function except in those cases where use of the Emergency CL Line is needed. As a result, overall reliability is reduced.

The 7 day Completion Time is based on the low probability of a design basis earthquake occurring during this time interval.

ACTIONS

AC.1 and C.2

If the Emergency CL Line is ~~one or more~~ cooling towers have one fan inoperable (i.e., up to one fan per cooling tower inoperable), action must be taken to verify one emergency bay sluice gate is open within 1 hour, and restore the inoperable cooling tower fan(s) Emergency CL Line to OPERABLE status within 7 days.

CL3.7-157

The 1 hour and 7 day Completion Times are reasonable based on the low probability of an accident design basis earthquake occurring during the 7 days that the Emergency CL Line ~~one cooling tower fan~~ is inoperable (in one or more cooling towers), the number of available availability through the normal operating path and associated traveling screens systems, and the time required to reasonably complete the Required Actions.

R-11

(continued)

PA3.7-162

PA3.7-201

BASES

in both trains. A CRFSRVS train is OPERABLE when the associated:

- a. Cleanup fan is OPERABLE;
- b. HEPA filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions; and
- c. ~~Heater, demister, D~~uctwork, valves, and dampers are OPERABLE, and air circulation can be maintained; and-
- d. Instrumentation, including associated radiation monitor for starting the cleanup fan, is OPERABLE, or the system is aligned to perform its safety function and is operating.

CL3.7-298

PA3.7-296

In addition, the control room boundary must be maintained, including the integrity of the walls, floors, ceilings, ductwork, and access doors.

PA3.7-297

Opening a door for personnel ingress or egress does not make the control room ventilation zone boundary inoperable. Blocking a door open (e.g., for maintenance) without a person present to close the door requires entry into an ACTION.

TA3.7-354

The LCO is modified by a Note allowing the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the

R-11

(continued)

PA3.7-162

PA3.7-201

BASES

control room. This individual will have a method to rapidly close the opening when a need for control room isolation is indicated.

R-11

APPLICABILITY

In MODES 1, 2, 3, and 4 for either unit, ~~[5, and 6,]~~ and ~~during movement of irradiated fuel assemblies [and during CORE ALTERATIONS]~~, CREFSCRSVS must be OPERABLE to control operator exposure during and following a DBA.

CL3.7-164

TA3.7-165

~~In [MODE 5 or 6], the CREFS is required to cope with the release from the rupture of an outside waste gas tank.~~

CL3.7-164

In addition, ~~d~~during movement of irradiated fuel assemblies ~~[and CORE ALTERATIONS]~~, the CREFSCRSVS must be OPERABLE to cope with the release from a fuel handling accident.

TA3.7-165

ACTIONS

A.1

R-11

When one CREFSCRSVS train is inoperable, action must be taken to restore OPERABLE status within 7 days.

In this Condition, the remaining OPERABLE CREFSCRSVS train is adequate to perform the control room protection function. However, the overall redundancyreliability is reduced because only a single CRSVS train remainsfailure in the OPERABLE CREFS train could result in loss of CREFS function.

The 7 day Completion Time is based on the low probability of a DBA or fuel handling accident occurring during this time period, and ability of the remaining train to provide the required capability.

CL3.7-301

(continued)

PA3.7-162

PA3.7-201

BASES

B.1

TA3.7-354

If the control room boundary is inoperable in MODES 1, 2, 3, and 4, the CRSVS train cannot perform their intended functions. Actions must be taken to restore an OPERABLE control room boundary within 24 hours. During the period that the control room boundary is inoperable, appropriate compensatory measures should be utilized to protect control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hours Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the control room boundary.

BC.1 and BC.2

TA3.7-354

In MODE 1, 2, 3, or 4, if the inoperable CREFS CRSVS train or control room boundary cannot be restored to OPERABLE status within the required Completion Time, the both units must be placed in a MODE that minimizes accident risk. To achieve this status, the units must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours.

R-11

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

(continued)

PA3.7-162

PA3.7-201

BASES

ED.1, C.2.1, and ED.2.2

~~[In MODE 5 or 6, or] during movement of irradiated fuel assemblies [, or during CORE ALTERATIONS], if the inoperable GREFSCRSVS train cannot be restored to OPERABLE status within the required Completion Time, Required Action D.1 must be taken to immediately place the OPERABLE GREFSCRSVS train in the emergency mode. This is a reasonable action, based on engineering judgement, to assure the control room air is filtered in the event of an accident. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure would be readily detected.~~

R-11

TA3.7-165

R-11

PA3.7-302

An alternative to Required Action ED.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the control room. Required Action ED.2 This places the unit plant in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

R-11

~~Required Action C.1 is modified by a Note indicating to place the system in the toxic gas protection mode if automatic transfer to toxic gas protection mode is inoperable.~~

CL3.7-166

DE.1 and D.2

~~[In MODE 5 or 6, or] If two CRSVS trains are inoperable during movement of irradiated fuel assemblies [, or during CORE ALTERATIONS], with two CREFS trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room.~~

R-11

TA3.7-165

(continued)

PA3.7-162

PA3.7-201

BASES

This places the ~~unit~~ plant in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

EF.1

TA3.7-354

If both CREFSCRSVS trains are inoperable in MODE 1, 2, 3, or 4, for reasons other than inoperable control room boundary (i.e., Condition B) the CREFSCRSVS may not be capable of performing the intended function and the unit is in a condition outside the accident analyses.

R-11

Therefore, LCO 3.0.3 must be entered immediately for both units.

SURVEILLANCE
REQUIREMENTS

SR 3.7.10.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train once every month provides an adequate check of this system. ~~Monthly heater operations dry out any moisture accumulated in the charcoal from humidity in the ambient air. [Systems with heaters must be operated for ≥ 10 continuous hours with the heaters energized. Each trainSystems must be operated without heaters need only be operated for ≥ 15 minutes to demonstrate the system functions of the system.]~~ The 31 day Frequency is based on the reliability of the equipment and the two train redundancy availability.

CL3.7-167

SR 3.7.10.2

This SR verifies that the required CREFSCRSVS filter testing is performed in accordance with the [Ventilation Filter Testing Program (VFTP)]. ~~The CREFS filter tests are in accordance with Regulatory Guide 1.52~~

PA3.7-303

(continued)

PA3.7-162

PA3.7-201

BASES

~~(Ref. 3).~~—The [VFTP] includes testing the performance of the HEPA filter, charcoal adsorber efficiency, minimum flow rate, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the [VFTP].

SR 3.7.10.3

The CRSVS may be actuated by either a safety injection signal or a high radiation signal. This SR verifies that each CREFSCRSVS train starts and operates on an actual or simulated safety injection actuation signal and verifies each CRSVS train starts and operates on and actual or simulated high radiation signal. The Frequency of 24 [18] months allows performance when a unit is shutdown is specified in Regulatory Guide 1.52 (Ref. 3).

CL3.7-292

X3.7-137

SR 3.7.10.4

This SR verifies ~~the integrity of the control room enclosure, and the assumed inleakage rates of the potentially contaminated air. The control room positive pressure, with respect to potentially contaminated adjacent areas, is periodically tested to verify proper functioning of the CREFSCRSVS. During the emergency mode of operation, the CREFSCRSVS train is designed to provide 4000 ± 10% cfm pressurize the control room ≥ [0.125] inches water gauge positive pressure with respect to adjacent areas in order to prevent unfiltered inleakage. The CREFS is designed to maintain this positive pressure with one train at a makeup flow rate of [3000] cfm.~~

CL3.7-168

The Frequency of 24 [18] months on a STAGGERED TEST BASIS is consistent with the guidance provided in NUREG-0800 (Ref. 4) industry component reliability experience.

X3.7-137

CL3.7-304

PA3.7-162

PA3.7-201

BASES

REFERENCES

1. UFSAR, Section 10.3~~[6.4]~~.
 2. UFSAR, Section~~Chapter~~ 14.9~~[15]~~.
 3. 10 CFR 50 Appendix A, GDC Criterion 19~~Regulatory~~
Guide 1.52, Rev. 2.
 - ~~4. NUREG-0800, Section 6.4, Rev. 2, July 1981.~~
-
-

BASES (continued)

APPLICABILITY

In MODES 1, 2, 3, and 4, ~~[5, and 6,]~~ and during movement of irradiated fuel assemblies ~~[and during CORE ALTERATIONS]~~, the SCWSCREATCS must be OPERABLE to ensure that the ~~control~~ room temperatures will not exceed equipment operational requirements in the essential areas this system serves following an accident ~~isolation of the control room.~~

TA3.7-165

PA3.7-171

In MODES 5 and 6, the OPERABILITY requirements of the SCWS are determined by the systems it supports. ~~[In MODE 5 or 6,] CREATCS may not be required for those facilities that do not require automatic control room isolation.~~

ACTIONS

A.1

R-11

With one SCWSCREATCS ~~train~~ loop inoperable, action must be taken to restore OPERABLE status within 30 days.

In this Condition, the remaining OPERABLE SCWSCREATCS ~~train~~ loop is adequate to ~~maintain the control room~~ temperature within limits provide cooling. However, the overall reliability is reduced because a single failure in the OPERABLE SCWS ~~loop~~ CREATCS ~~train~~ could result in loss of SCWSCREATCS function.

The 30 day Completion Time is based on the low probability of an event requiring SCWS loop separation ~~control room isolation~~, the consideration that the remaining loop ~~train~~ can provide the required protection, and that alternate safety or nonsafety related cooling means are available.

(continued)

PA3.7-169

PA3.7-201

BASES

ACTIONS
(continued)B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable SCWSGREATCS ~~train~~ loop cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes the risk.

PA3.7-169

To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within

36 hours.

R-11

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1, C.2.1, and C.2.2

~~[In MODE 5 or 6, or] d~~During movement of irradiated fuel ~~[, or during CORE ALTERATIONS]~~, if the inoperable SCWS GREATCS ~~train~~ loop cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE SCWSGREATCS ~~train~~ loop must be placed in operation immediately. This action ensures that the required cooling function is provided ~~remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that active failures will be readily detected.~~

PA3.7-169

An alternative to Required Action C.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. Required Action C.2 ~~This~~ places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

R-11

(continued)

PA3.7-172

PA3.7-201

BASES

failure disables the other train coincident with loss of offsite power.

This OPERABILITY requirement ensures that ~~Total system failure could result in~~ the atmospheric releases, in the event of a Design Basis Accident (DBA) in containment, from the ECCS pump room leakage and containment leakage which bypasses the shield building would not result in doses exceeding 10 CFR 100 limits (Ref. 5) ~~in the event of a Design Basis Accident (DBA).~~

CL3.7-321

ECCS PREACS is considered OPERABLE when the individual components necessary to maintain the ECCS pump room filtration are OPERABLE in both trains.

CL3.7-322

In order for the ABSVS to be OPERABLE, the Turbine Building roof exhausters fans must be capable of being de-energized within 30 minutes following a loss of coolant accident.

An ABS/SECCS PREACS train is considered OPERABLE when its associated:

R-11

LCO
(continued)

- a. Fan is OPERABLE;
- b. HEPA filter and charcoal adsorbers ~~are not excessively restricting flow, and~~ are capable of passing their design flow and performing their filtration functions; and
- c. Heater, ~~demister,~~ ductwork, valves, and dampers are OPERABLE and air circulation can be maintained.

The ABSV boundary is OPERABLE if both of the following conditions can be met:

CL3.7-174

(continued)

PA3.7-172

PA3.7-201

BASES

a. Openings in the ABSV boundary are under direct administrative control and can be reduced to less than 10 square feet within 6 minutes following an accident; and

b. Dampers and actuation circuits that isolate the Auxiliary Building Normal Ventilation System following an accident are OPERABLE or can be manually isolated within 6 minutes following an accident.

CL3.7-174

The LCO is modified by a Note allowing the ABSV boundary to be opened under administrative controls. As discussed above, openings must be closed to less than 10 square feet within 6 minutes following an accident.

R-11

CL3.7-174

APPLICABILITY

In MODES 1, 2, 3, and 4 for either unit, the ABSVSECCS PREACS is required to be OPERABLE ~~consistent with the OPERABILITY requirements of the ECCS.~~

PA3.7-323

When both units are in MODE 5 or 6, the ABSVSECCS-PREACS is not required to be OPERABLE ~~since the ECCS is not required to be OPERABLE.~~

ACTIONS

A.1

With one ABSVSECCS-PREACS train inoperable, action must be taken to restore OPERABLE status within 7 days. During this time, the remaining OPERABLE train is adequate to perform the ABSVSECCS-PREACS function.

The 7 day Completion Time is appropriate because the ABSVS risk contribution is substantially less than

PA3.7-323

(continued)

PA3.7-172

PA3.7-201

BASES

that for the ECCS (72 hour Completion Time), ~~and this system is not a direct support system for the ECCS.~~ The 7 day Completion Time is based on the low probability of a DBA occurring during this time period, and ability of the remaining train to provide the required capability.

Concurrent failure of two ABSVSECCS-PREACS trains would result in the loss of functional capability; therefore, LCO 3.0.3 must be entered immediately.

B.1

With both ABSVS trains inoperable due to an inoperable ABSV boundary, action must be taken to restore OPERABLE status within 24 hours.

CL3.7-174

The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the availability of the ABSVS to provide a filtered release (albeit with potential for some unfiltered leakage).

If the ABSV boundary cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply.

R-11

(continued)

PA3.7-172

PA3.7-201

BASES

CB.1 and CB.2

If anthe ABSVSECCS-PREACS train cannot be restored to OPERABLE status or the ABSV boundary cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply.

CL3.7-174

To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours.

R-11

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.12.1

This SR verifies that each ABSVS train can be manually started, the associated filter heater energizes, and the filter units remain sufficiently dried out to ensure they can perform their function.

PA3.7-324

circulation

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not severe, testing each train once a month provides an adequate check on this system. Monthly heater operations, with air through the filter, driesy out any moisture that may have accumulated in the charcoal from humidity in the ambient air. ~~[Systems with heaters]~~ Each ABSVS train must be operated ≥ 10 continuous hours per

CL3.7-175

(continued)

PART F
PACKAGE 3.7
PLANT SYSTEMS

**JUSTIFICATION FOR DIFFERENCES FROM IMPROVED STANDARD
TECHNICAL SPECIFICATIONS (NUREG-1431) AND BASES**

See Part E for specific proposed wording and location of referenced deviations.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	111	CTS requires PI to have all MSSVs operable or the unit is required to shut down. PI has revised the associate Required Action to allow 4 hours for one MSSV to be inoperable until initiation of a unit shutdown is initiated. The 4 hours is reasonable due to the low probability of an event occurring during this time requiring MSSV operation. TSTF - 235, which mostly deals with graduated plant power levels associated with inoperable MSSVs, has generally not been incorporated in this Specification and Bases. However, the statement of the LCO has been revised to be consistent with TSTF - 235 since this is an improvement which applies without the provisions for graduated power levels.
CL	112	Since PI intends to require all MSSV to be operable, it is unacceptable to allow more than one MSSVs to be inoperable at any given time and keep the plant operating. Therefore, use of Separate Condition entry is not appropriate and has not been included in the PI ITS.

Difference Category	Difference Number 3.7-	Justification for Differences
	113	Not used.
PA	114	Since PI only has two MSIV, the affected portions of Specification 3.7.2 have been revised accordingly.
CL	115	The Applicability modifier "de-activated" is not included since CTS requirements do not apply in MODE 3 when both MSIVs are closed. They are not required to be de-activated, since they can not be re-opened without manually opening the bypass valve.
CL	116	The CTS requirement for this surveillance requires the test to be performed each refueling cycle. Since Prairie Island intends to extend the plant refueling cycle up to 24 months, this Frequency is also extended to 24 months.
TA	117	SR 3.7.2.1 and SR 3.7.3.1 are revised to separate the closure time testing and the actuation signal testing into separate surveillances. These changes incorporate TSTF-289.

Difference Category	Difference Number 3.7-	Justification for Differences
	126	Not used.
PA	127	PI has two trains of AFW for each unit. Therefore, this specification is written to require two AFW trains.
CL	128	This change adds a Note to the LCO and Bases which will allow the system to operate and still be considered OPERABLE for safety related requirements. PI requires this Note to incorporate NRC TS interpretation issued to NSP October 16, 1997. Since PI has only two trains of AFW per unit and the AFW system is required to operate as part of normal plant startup and shutdown, this change is required. This change is consistent with TSTF- 245, Revision 1 (See TA3.7-136).
CL	129	CTS only requires the AFW system to be operable in MODES 1, 2, and 3; therefore the applicability requirements for MODE 4 are not included. Also, the related clause for Condition B and all of Condition E have been deleted.

Difference Category	Difference Number 3.7-	Justification for Differences
X	130	This ITS conversion LAR proposes to require testing of the SG PORV at the interval specified in the IST Program. The IST Program, which is approved by the NRC, currently requires the SG PORV to be tested quarterly. A change in this interval would be reviewed and approved by the NRC. This interval is more frequent than the bracketed 18 month interval in NUREG-1431. This change is also discussed in DOC L3.7-95.
	131	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	141	PI has three condensate storage tanks which are interconnected to commonly serve both PI units. Thus, these tanks form a system which is shared between PI Units 1 and 2. Therefore, an "s" has been added to "CST" in the title and Condition A to show it is the system of tanks, not just one tank, that is under consideration.
TA	142	This change incorporates approved traveler, TSTF-140 which requires the CSTs to be operable rather than specifying tank contents.
CL	143	CTS requires CSTs operable when either unit is in MODE 1, 2, or 3. Therefore, MODE 4 operability requirements are not included in the PI CTS. This is acceptable since in MODE 4, the pressure and temperature limitation are such that the probability for a design basis event requiring plant cool down using SG PORVs is low. Also, in MODE 4 the RHR system is available to provide adequate decay heat removal. The associated Bases have also been modified to be consistent with these changes.

Difference Category	Difference Number 3.7-	Justification for Differences
	149	Not used.
TA	150	This change incorporates TSTF - 340, Revision 3. Modification of the Bases inserts have been made to reflect the PI AFW system design features.
CL	151	Two SRs and associated Bases, which are not provided in NUREG-1431, are included to incorporate CTS requirements for testing CL pump operability. Since these pumps may not be normally operating, operability testing is required.

Difference Category	Difference Number 3.7-	Justification for Differences
	155	Not used.
CL	156	New Action Statements A and B are included to incorporate CTS requirements for the safeguards traveling screens. These requirements are the same as CTS except for changes required to conform to the ISTS format (such changes were addressed in Part D, Discussion of Changes to CTS). Associated Bases have also been provided.
CL	157	The Action Statements and associated Required Actions and Completion Times have been modified to incorporate CTS requirements to assure that at least one emergency bay sluice gate is open. These requirements are the same as CTS except for changes required to conform to the ISTS format (such changes were addressed in Part D, Discussion of Changes to CTS, for this Section). Associated Bases have also been provided.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	162	The system which provides a protected environment from which operators can control the unit following an uncontrolled release of radioactivity at PI is called the Control Room Special Ventilation System (CRSVS). Thus, this specification title, LCO, affected Action Statements, SRs and associated Bases have been revised to incorporate this change.
	163	Not used.
CL	164	Bracketed MODES 5 and 6 are not included in the Applicability, affected Action Statements and Bases. As stated in the ISTS Bases for this specification, these MODES are applicable when the plant has external waste gas storage tanks which could rupture. Since PI does not have external waste gas storage tanks, these MODES are not applicable.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	171	The SCWS at PI is a shared system which supports the operation of both units. Since this system supports the CRSVS which is not required to be operable in MODES 5 and 6, the SCWS is likewise not required to be operable in MODES 5 and 6.
PA	172	The PI Auxiliary Building Special Ventilation System (ABSVS) is the system which most closely resembles the Emergency Core Cooling System Pump Room Exhaust Air Cleanup System. Therefore, the name of this specification has been revised to ABSVS in the title, LCO, affected Action Statements, SRs and throughout the associated Bases.
	173	Not used.

Difference Category	Difference Number 3.7-	Justification for Differences
CL	346	PI has two different designs of stored spent fuel which require two separate figures in Specification 3.7.17. Thus, this discussion is modified to identify the two types of spent fuel and reference the PI specific figures.
CL	347	The Bases ASA discussion has been replaced with discussion derived from the CTS Bases. This discussion differs from NUREG-1431 since PI has been licensed to credit the soluble boron in the spent fuel pool.
PA	348	Specification 3.7.8 Required Actions A.1 and B.2 have been modified by the addition of the clause, "10 days from discovery of failure to meet the LCO". Similarly, required Action D.1 has been modified by the addition of the clause, "9 days from discovery of failure to meet the LCO". These additions are necessary because of the unique requirements of the Prairie Island Cooling Water specification requirements and to make the Completion Times consistent with similar ISTS Completion Time requirements. The associated Bases have also been revised to explain these additional allowed outage time limitations.
	349	Not used.
	350	Not used.
CL	351	The CTS also requires a minimum boron concentration when loading and unloading spent fuel storage casks. For completeness, these activities are included in the Bases LCO discussion.

Difference Category	Difference Number 3.7-	Justification for Differences
PA	352	The Bases References have been changed to be consistent with the CTS references since most of the discussion in this Bases was derived from the CTS Bases.
PA	353	ITS 3.7.4 Required Action B Completion Time and associated Bases have been revised from 24 hours to 1 hour. The ISTS Completion Time of 24 hours was based on a 4 loop plant, whereas PI is a two loop plant. Due to only having two loops, PI cannot justify having both SG PORVs inoperable for up to 24 hours. The 1 hour Completion Time allows time to plan an orderly shutdown of the unit. Even though the SG PORVs are inoperable for the 1 hour, the ADVs and MSIVs are still OPERABLE for decay heat removal as needed, in addition there would be a low probability of an event occurring during this 1 hour period that would require the SG PORVs to function. This Completion Time is consistent with CTS 3.0.C which allows 1 hour to initiate action a reactor shutdown.
TA	354	TSTF-287, Rev. 5 has been incorporated.

PART G
PACKAGE 3.7
PLANT SYSTEMS

NO SIGNIFICANT HAZARDS DETERMINATION
AND ENVIRONMENTAL ASSESSMENT

NO SIGNIFICANT HAZARDS DETERMINATION

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10CFR Part 50, Section 50.91 using the standards provided in Section 50.92.

For ease of review, the changes are evaluated in groupings according to the type of change involved. A single generic evaluation may suffice for some of the changes while others may require specific evaluation in which case the appropriate reference change numbers are provided.

A - Administrative (GENERIC NSHD)

(A3.7-00, A3.7-01, A3.7-02, A3.7-04, A3.7-05, A3.7-06, A3.7-09, A3.7-20, A3.7-21, A3.7-34, A3.7-36, A3.7-44, A3.7-45, A3.7-47, A3.7-57, A3.7-62, A3.7-66, A3.7-74, A3.7-77, A3.7-78, A3.7-83, A3.7-94, A3.7-97, A3.7-105, A3.7-113)

Most administrative changes have not been marked-up in the Current Technical Specifications, and may not be specifically referenced to a discussion of change. This No Significant Hazards Determination (NSHD) may be referenced in a discussion of change by the prefix "A" if the change is not obviously an administrative change and requires an explanation.

These proposed changes are editorial in nature. They involve reformatting, renaming, renumbering, or rewording of existing Technical Specifications to provide consistency with NUREG-1431 or conformance with the Writer's Guide, or change of current plant terminology to conform to NUREG-1431. Some administrative changes involve relocation of requirements within the Technical Specifications without affecting their technical content. Clarifications within the new Prairie Island Improved Technical Specifications which do not impose new requirements on plant operation are also considered administrative.

M - More restrictive (GENERIC NSHD)

(M3.7-08, M3.7-12, M3.7-13, M3.7-14, M3.7-15, M3.7-16, M3.7-23, M3.7-26, M3.7-27, M3.7-30, M3.7-35, M3.7-37, M3.7-39, M3.7-40, M3.7-42, M3.7-46, M3.7-48, M3.7-49, M3.7-51, M3.7-52, M3.7-53, M3.7-55, M3.7-58, M3.7-59, M3.7-60, M3.7-61, M3.7-65, M3.7-73, M3.7-75, M3.7-76, M3.7-104, M3.7-107, M3.7-108, M3.7-109, M3.7-110, M3.7-115, M3.7-116, M3.7-119)

This proposed Technical Specifications revision involves modifying the Current Technical Specifications to impose more stringent requirements upon plant operations to achieve consistency with the guidance of NUREG-1431, correct discrepancies or remove ambiguities from the specifications. These more restrictive Technical Specifications have been evaluated against the plant design, safety analyses, and other Technical Specifications requirements to ensure the plant will continue to operate safely with these more stringent specifications.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes provide more stringent requirements for operation of the plant. These more stringent requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event.

These more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed changes do not involve a physical alteration of the plant, that is, no new or different type of equipment will be installed, nor do they change the methods governing normal plant operation.

These more stringent requirements do impose different operating restrictions. However, these operating restrictions are consistent with the boundaries established by the assumptions made in the plant safety analyses and licensing bases. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

R - Relocation (GENERIC NSHD)

(R3.7-32, R3.7-69, R3.7-79, R3.7-81, R3.7-106)

This License Amendment Request (LAR) proposes to relocate requirements contained in the Current Technical Specifications out of the Technical Specifications into licensee controlled programs. These requirements are relocated because they 1) do not meet the Technical Specifications selection criteria defined in 10 CFR 50.36; or 2) are mandated by current Nuclear Regulatory Commission (NRC) regulations and are therefore unnecessary in the Technical Specifications.

In the NRC Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (dated 7/16/93), the NRC stated:

... since 1969, there has been a trend towards including in Technical Specifications not only those requirements derived from the analyses and evaluations included in the safety analysis report but also essentially all other Commission requirements governing the operation of nuclear power reactors. . . . This has contributed to the volume of Technical Specifications and to the several-fold increase, since 1969, in the number of license amendment applications to effect changes to the Technical Specifications. It has diverted both staff and licensee attention from the more important requirements in these documents to the extent that it has resulted in an adverse but unquantifiable impact on safety.

Thus, relocation of unnecessary requirements from the Current Technical Specifications should result in an overall improvement in plant safety through more focused attention to the requirements that are most important to plant safety.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

These proposed changes relocate requirements for structures, systems, components or variables which did not meet the criteria for inclusion in the improved Technical Specifications, or which duplicate regulatory requirements. The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events.

LR - Less restrictive, Relocated details (GENERIC NSHD)

(LR3.7-17, LR3.7-18, LR3.7-19, LR3.7-24, LR3.7-28, LR3.7-29, LR3.7-38, LR3.7-41, LR3.7-43, LR3.7-63, LR3.7-64, LR3.7-67, LR3.7-68, LR3.7-82, LR3.7-84, LR3.7-86, LR3.7-87, LR3.7-98, LR3.7-99, LR3.7-100, LR3.7-102, LR3.7-112)

Some information in the Prairie Island Current Technical Specifications that is descriptive in nature regarding the equipment, system(s), actions or surveillances identified by the specification has been removed from the proposed specification and relocated to the proposed Bases, Updated Safety Analysis Report or licensee controlled procedures. The relocation of this descriptive information to the Bases of the Improved Technical Specifications, Updated Safety Analysis Report or licensee controlled procedures is acceptable because these documents will be controlled by the Improved Technical Specifications required programs, procedures or 10CFR50.59. Therefore, the descriptive information that has been moved continues to be maintained in an appropriately controlled manner.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes relocate detailed, descriptive requirements from the Technical Specifications to the Bases, Updated Safety Analysis Report or licensee controlled procedures. These documents containing the relocated requirements will be maintained under the provisions of 10CFR50.59, a program or procedure based on 10CFR50.59 evaluation of changes, or NRC approved methodologies. Since these documents to which the Technical Specifications requirements have been relocated are evaluated under 10CFR50.59 or its guidance, or in accordance with NRC approved methodologies, no increase in the probability or consequences of an accident previously evaluated will be allowed without prior NRC approval. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

L - Less restrictive, Specific

Each CTS change which is designated as Less (L prefix) restrictive on plant operations is provided with a specific NSHD.

Specific NSHD for Change L3.7-03

CTS does not provide an action statement addressing inoperability of one or more MSSVs; therefore the unit would be required to enter CTS 3.0.C if a MSSV were inoperable. CTS 3.0.C allows 1 hour to implement corrective action whereas this change proposes to allow four hours to implement corrective action. This change is acceptable because the probability is very low that a pressure transient will occur during this additional three hours; the SG PORVs will initially address a main steam pressure transient so the probability the MSSVs will be required to operate during this additional three hours is even lower. Furthermore, there are four other MSSVs, which service the SG being affected, which further reduces the likelihood that any particular MSSV will be required at any time. This change is consistent with the approved GITS.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves extending the time allowed for one MSSV to be inoperable while corrective actions are implemented. Since MSSV design or Function has not changed, this change does not affect the probability of an accident. There are other system design features, such as the SG PORVs, which provide for pressure transient protection. In addition, the probability of an event, which requires any particular MSSV to operate is very low. Therefore this change does not involve a significant increase in the probability or consequences of an accident.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-03 (continued)

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

The proposed change in effect extends the time for a MSSV to be inoperable while corrective actions are implemented from one hour to four hours. The probability of a plant transient during the three additional hours, which would require the inoperable MSSV to operate, is very low. The additional three hours allows the plant to attempt to make repairs and prepare for a well, planned shutdown. The process of shutting down the plant is more likely to cause a transient requiring the MSSVs than continued plant operation. Furthermore, there are other plant design features, such as the SG PORVs and Steam Dumps, to mitigate steam line pressure transients. Thus, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

Specific NSHD for Change L3.7-07

CTS allow one SG PORV to be inoperable for 48 hours. Since there are other means available to provide a heat sink for the SGs, it is acceptable to extend this outage time to 7 days. This change would also allow both SG PORVs to be inoperable for 1 hour. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves extending the time allowed for one SG PORV to be inoperable and defines allowable outage time for both SG PORVs inoperable. Since the SG PORV design or Function has not changed, these changes do not affect the probability of an accident. There are other systems which provide a comparable SG heat sink such as the Steam Dumps to the condenser, Steam Dumps to the atmosphere and the Main Steam Safety Valves. Thus the unavailability of one SG PORV for up to 7 days or both SG PORVs up to 1 hour does not involve a significant increase in the consequences of an accident. Also the probability of an event requiring use of a SG PORV during these allowed outage times is low.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change makes the PI ITS consistent with the guidance of NUREG-1431 and does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident.

Specific NSHD for Change L3.7-114

This change allows separate Condition entry when both MSIVs are inoperable while in Mode 2 or 3. This change is acceptable since the Required Actions assure that the safety function of the MSIVs continue to meet the PI safety analysis. This change is consistent with the guidance of NUREG-1431.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change will allow separate Condition entry for the MSIVs when the plant is in Mode 2 or 3. The Required Action requires that an inoperable MSIV be closed within 8 hours and verified closed once per 7 days. When in the closed position, the MSIV is performing its intended safety function. Since the MSIVs are not design basis accident initiators, this change does not involve an increase in the probability of an accident. Therefore, this change does not involve a significant increase in the consequences of an accident previously evaluated.

Since the Required Action requires the MSIV to be closed, it will be performing its intended safety function. Therefore, this proposed change does not involve a significant increase in the consequences of an accident previously evaluated.

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Specific NSHD for Change L3.7-114 (continued)

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

The proposed change allows the plant to continue operating in Modes 2 or 3 with an inoperability in both MSIVs in conformance with the guidance of NUREG-1431. Since a condition is not defined in the CTS for simultaneous inoperabilities of both MSIVs in these Modes, the plant would be required to enter LCO 3.0.C and shut down. Required Action C allows a MSIV to be closed in 8 hours and verified closed once per 7 days. Since the MSIV would be closed, it would be performing its intended safety function. Therefore this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

Specific NSHD for Change L3.7-117

CTS 3.3.C.1 (b) requires that during STARTUP OPERATION or POWER OPERATION, "any one of" the following conditions of inoperability may exist provided startup operation is discontinued until OPERABILITY is restored. If OPERABILITY is not restored within the time specified, be in at least HOT SHUTDOWN within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- (1) One of the assigned component cooling pumps may be inoperable for 72 hours.
- (2) One of the assigned component cooling heat exchangers may be inoperable for 72 hours.

The CTS does not allow a component cooling pump and a cooling heat exchanger to be inoperable at the same time. The ITS allow an entire train to be inoperable for 72 hours. A train in this case is the component cooling pump and component cooling heat exchanger. Allowing both to be inoperable makes this a less restrictive change.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This change eliminates the CTS requirement of having either a component cooling (CC) pump or CC heat exchanger inoperable at the same time whereas, the ITS allows having an entire CC train inoperable. The CC train, in the ITS, includes both the CC pump and CC heat exchanger. PI design is that the CC pumps are interconnected so that either pump from either unit can be manually aligned to serve any heat exchanger, and the capability of manually switching the pumps enables the two unit system to tolerate loss of an additional pump with one pump already out of service. The heat exchangers are not similarly interconnected, so loss or outage of a heat exchanger disables one set of essential equipment in one unit. Therefore, the ITS allowing a train to be inoperable allows either a CC pump or CC heat exchanger to be inoperable or both can be inoperable. Once the CC heat exchanger is lost, the entire train would be inoperable and therefore, requiring entry into Condition A. PI has been analyzed for the event where a failure disables an entire loop consisting a pump and heat exchanger, in the same train. In this case, the plant would have sufficient CC cooling to successfully and safely shut down the unit. For a LOCA, PI safety analysis shows that one CC pump and CC heat exchanger can accommodate the heat removal loads. Therefore, redefining the CTS requirements of allowing a CC train to be inoperable does not involve a significant increase in the consequences of an accident previously evaluated.

Since the CC system is not an assumed accident initiator in the PI USAR Safety Analysis, there is not a significant increase in the probability of an accident previously evaluated.

Specific NSHD for Change L3.7-117 (continued)

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Allowing a CC train to be inoperable as allowed by the ITS supports PI safety analysis. PI is analyzed for losing a loop of CC during a LOCA and still ensuring plant safe shutdown as discussed in USAR 10.4.2.3. Therefore, the CTS change is consistent with NUREG-1431 and PI accident analysis. Therefore this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

Specific NSHD for Change L3.7-118

The proposed change would allow the control room boundary to be open with both trains of the CRSVS inoperable under administrative controls for 24 hours while the unit is in MODES 1, 2, 3, or 4. The CTS does not allow this flexibility.

1. The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed change would allow the control room boundary to be opened with both trains of CRSVS inoperable for 24 hours under administrative controls. Requiring the plant to enter LCO 3.0.3 when the ventilation envelope is not intact is excessive and not appropriate. If the control room boundary is inoperable in MODES 1, 2, 3, and 4, the CRSVS trains cannot perform their intended functions. Actions must be taken to restore an OPERABLE control room boundary within 24 hours. Preplanned measures would be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period, and the use of compensatory measures. The 24 hour Completion Times is a typically reasonable time to diagnose, plan, and possibly repair, and test most problems with the control room boundary. Accident consequences are not significantly increased because any opening in the control room envelope (under this Specification) is under direct administrative controls, thus, the control room boundary integrity can be restored in the event of a DBA. This proposed change can only be applied to those areas where administrative control will not be precluded by the initiating event itself. For example, administrative control cannot be credited for an open door (required for steam exclusion) if the person(s) controlling the door would be precluded from restoring the control room boundary by a main steam line break. Therefore, allowing the control room boundary to be open with both trains of CRSVS to be inoperable for 24 hours under administrative controls does not involve a significant increase in the consequences of an accident previously evaluated.

Specific NSHD for Change L3.7-118 (continued)

2. The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously analyzed.

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The proposed change introduces no new mode of plant operation or changes in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Allowing both CRSVS trains to be inoperable for up to 24 hours under administrative controls is acceptable. During this time, entry and exit of plant personnel would be allowed. In addition, appropriate compensatory measures will be utilized to protect the control room operators from potential hazards such as radioactive contamination, toxic chemicals, smoke, temperature and relative humidity, and physical security. During this proposed time, control room integrity can be restored as needed. This proposed change can only be applied to those areas where administrative control will not be precluded by the DBA itself. The 24 hour Completion Time is reasonable based on the low probability of a DBA occurring during this time period in addition to the use of other compensatory measures. This change does not significantly reduce the margin of safety because it provides an equivalent level of CRSVS protection to the control room, such that the control room operators are not prevented from maintaining the integrity of fuel cladding, the reactor coolant system, or the containment. Based on the above, this change does not involve a significant reduction in the margin of safety.

Therefore it is concluded this proposed change does not involve a significant hazards consideration.

ENVIRONMENTAL ASSESSMENT

The Nuclear Management Company has evaluated the proposed changes and determined that:

1. The changes do not involve a significant hazards consideration, or
2. The changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or
3. The changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR Part 51 Section 51.22(c)(9). Therefore, pursuant to 10 CFR Part 51 Section 51.22(b), an environmental assessment of the proposed changes is not required.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. Stored DG fuel oil supply:</p> <p>Unit 1 < 36,000 gal;</p> <p>Unit 2 < 65,000 gal.</p> <p><u>OR</u></p> <p>Required Action and associated Completion Time of Conditions A and C not met.</p>	<p>-----NOTE-----</p> <p>Enter applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits.</p> <p>-----</p> <p>D.1 Declare DGs inoperable.</p>	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.3.1 Verify stored DG fuel oil supply contains:</p> <p>Unit 1 \geq 42,000 gal;</p> <p>Unit 2 \geq 75,000 gal of fuel.</p>	31 days
<p>SR 3.8.3.2 Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.</p>	In accordance with the Diesel Fuel Oil Testing Program

BASES

ACTIONS
(continued)

D.1

With the stored fuel oil supply not within the limits specified or Required Actions and associated Completion Times of Conditions A or C not met, the DGs may be incapable of performing their intended function and must be immediately declared inoperable.

A Note has been added to Condition D requiring entry into the applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits. Since the diesel generators and the diesel driven CL pumps share a common storage tank, the diesel fuel oil properties are maintained by Specification 5.5.11, "Diesel Fuel Oil Testing Program." Therefore, if the fuel oil properties are not within limits, both the diesel generators and the diesel driven CL pumps are affected and appropriate Required Actions taken.

SURVEILLANCE
REQUIREMENTS

SR 3.8.3.1

This SR provides verification that there is an adequate inventory of fuel oil in the storage tanks to support the operation of one DG for 14 days. The 14 day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location.

The specified fuel oil inventory for the Unit 1 emergency diesel generators (EDGs) is in addition to the fuel oil inventory specified for the diesel driven cooling water pumps (LCO 3.7.8) that must be available in the Unit 1 diesel fuel oil storage system. There are four Design Class I fuel oil storage tanks for the Unit 1 EDGs and two Design Class I fuel oil storage tanks for the diesel driven cooling water pumps. These six Design Class I tanks are interconnected such that any tank can be manually aligned to supply any Unit 1

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.3.1 (continued)

EDG or diesel driven cooling water pump day tank. Any combination of inventory in these six tanks may be used to satisfy the inventory requirements for the Unit 1 EDGs and the diesel driven cooling water pumps. There are four Unit 2 Design Class I fuel oil storage tanks. The four Unit 2 tanks are interconnected such that any tank can be manually aligned to supply either Unit 2 EDG day tank. Any combination of inventory in these four Unit 2 tanks may be used to satisfy the Unit 2 EDG inventory requirements.

The 31 day Frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and unit operators would be aware of any large uses of fuel oil during this period.

SR 3.8.3.2

The tests for the new fuel oil prior to addition into the safeguards storage tank(s) are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate, detrimental impact on diesel engine combustion. If results from these tests are within acceptable limits, the fuel oil may be added to the safeguards storage tanks without concern for contaminating the entire volume of fuel oil in the safeguards storage tanks. These tests are to be conducted prior to adding the new fuel to the safeguards storage tank(s), but in no case is the time between receipt of new fuel and conducting the tests to exceed 31 days. The tests and limits for new and stored fuel are described in the Diesel Fuel Oil Testing Program of Specification 5.5.11.

BASES

SURVEILLANCE REQUIREMENTS

SR 3.8.3.2 (continued)

Failure to meet any of the limits specified in the Diesel Fuel Oil Testing Program is cause for rejection the new fuel oil, but does not represent a failure to meet the LCO concern since the fuel oil is not added to the storage tanks. Failure to meet any of the limits for stored fuel requires entry into Condition B.

REFERENCES

1. USAR, Sections 8.4 and 10.3.
 2. USAR, Section 14.
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A3.8-01

3.7.B.5. ~~D1 and D2 (Unit 2; D5 and D6)~~ Two diesel generators may be inoperable for 2 hours provided the two required paths from the grid to the unit 4 kV safeguards distribution system are OPERABLE and the OPERABILITY of the two required paths from the grid are verified OPERABLE within 1 hour.

LCO3.8.1
COND E

LCO3.8.3

Add LCO 3.8.3, Required Action B:
Required DG fuel oil tank with stored fuel oil properties not within limits, Restore the fuel oil tank properties to within limits within 7 days

M3.8-14

Add LCO 3.8.3, Required Action C:
Required Action and associated Completion Time of Condition B not met, isolate the associated DG fuel oil tank immediately.

M3.8-14

Add LCO 3.8.3, Condition D:
Stored DG fuel oil supply for unit 1 < 40,000 gallons; unit 2 < 64,000 gallons OR Required Action and associated Completion Time of Conditions A and C not, declare associated DGs inoperable immediately. Add Note - Enter applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits.

M3.8-14

M3.8-68

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LCO3.8.9
COND A,
B, C,
and D

One 4 kV safeguards bus (and/or its associated 480 V buses inoperable, restore to OPERABLE within 8 hours including associated one or more safeguards AC electrical power distribution Group 1, 2, or 3 motor control centers) may be may be inoperable or not fully energized restore to OPERABLE for in 8 hours, 72 hours or 7 days provided the redundant 4 kV safeguards bus and its associated 480 V safeguards buses are verified OPERABLE and the diesel generator and safeguards equipment associated with the redundant train are OPERABLE.

L3.8-16

A3.8-63

L3.8-09

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LCO3.8.4
COND A

7. One battery charger may be inoperable, restore the battery charger to OPERABLE status within for 8 hours verify provided, (a) its associated battery is OPERABLE, (b) its redundant counterpart is verified OPERABLE, and (c) the diesel generator and safeguards equipment associated with its counterpart are OPERABLE within 2 hours.

M3.8-18

LCO3.8.4
COND B

8. One battery may be DC safeguards electrical power source inoperable for 8 hours verify provided that the other battery and both battery chargers remain OPERABLE within 2 hours.

M3.8-19

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9. In addition to the requirements of Specification TS.3.7.A.7 a second inverter supplying Instrument AC Panels 111, 112, 113, and 114 may (Unit 2 panels 211, 212, 213 and 214) be powered from an inverter bypass source for 8 hours.

L3.8-09

LR3.8-02

NSHD category	Change number 3.8-	Discussion Of Change
	65-67	Not used
A	68	<p>New Note. A new Note has been added to NUREG-1431, LCO 3.8.3 Condition D requiring that if the diesel fuel oil cannot be restored to within limits, declare the DGs inoperable and "enter applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits." The PI design for the DGs and diesel driven CL pumps is a shared common fuel oil storage tank. The contents of the tank are controlled under ITS 5.5.11, "Diesel Fuel Oil Testing Program." In the event that the subject fuel oil properties are not within limits, ITS 3.8.3 provides specific Required Actions to restore the fuel oil to within limits or declare the DGs inoperable immediately. There are no separate Required Actions for the diesel driven CL pumps. If the fuel oil in the storage tanks is not within limits for the DGs, it is also not within limits for the diesel driven CL pumps. Providing this Note in the ITS maintains CTS and provides assurance that the quality of the fuel oil for the diesel driven CL pumps is maintained to within standards and ensuring the pumps remain OPERABLE. Since this change maintains CTS, this is considered an Administrative change.</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. One or more DGs with starting air receiver pressure \leq [225] psig and \geq [125] psig.	E.1 Restore starting air receiver pressure to \geq [225] psig.	48 hours
DF. Stored DG fuel oil supply: Unit 1 < 36,000 gal; Unit 2 < 65,000 gal. <u>OR</u> Required Action and associated Completion Time of Conditions A and C not met. <u>OR</u> One or more DGs diesel fuel oil, lube oil, or starting air subsystem not within limits for reasons other than Condition A, B, C, D, or E.	-----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits. ----- DF.1 Declare associated DGs inoperable.	Immediately <div>CL3.8-146</div> <div>PA3.8-218</div>

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SURVEILLANCE REQUIREMENTS

PA3.8-100 CL3.8-145

BASES

ACTIONS E.1

(continued)

~~With starting air receiver pressure \leq [225] psig, sufficient capacity for five successive DG start attempts does not exist. However, as long as the receiver pressure is \geq [125] psig, there is adequate capacity for at least one start attempt, and the DG can be considered OPERABLE while the air receiver pressure is restored to the required limit. A period of 48 hours is considered sufficient to complete restoration to the required pressure prior to declaring the DG inoperable. This period is acceptable based on the remaining air start capacity, the fact that most DG starts are accomplished on the first attempt, and the low probability of an event during this brief period.~~

DF.1

With the stored fuel oil supply not within the limits specified or a Required Actions and associated Completion Times of Conditions A or C not met, ~~or one or more DG's fuel oil, lube oil, or starting air subsystem not within limits for reasons other than addressed by Conditions A through D,~~ the associated DGs may be incapable of performing ~~its~~their intended function and must be immediately declared inoperable.

PA3.8-218

A Note has been added to Condition D requiring entry into the applicable Conditions and Required Actions of LCO 3.7.8, "CL System" when Condition D is entered as a result of stored fuel oil properties not within limits. Since the diesel generators and the diesel driven CL pumps share a common storage tank, the diesel fuel oil properties are

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(continued)

PA3.8-100 CL3.8-145

BASES

maintained by Specification 5.5.11, "Diesel Fuel Oil Testing Program." Therefore, if the fuel oil properties are not within limits, both the diesel generators PA3.8-218 and the diesel driven CL pumps are affected and appropriate Required Actions taken.

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SURVEILLANCE
REQUIREMENTSSR 3.8.3.1

This SR provides verification that there is an adequate inventory of fuel oil in the storage tanks to support the operation of one ~~DGeach DG's~~ operation for 714 days ~~at full load~~. The 714 day period is sufficient time to place the unit in a safe shutdown condition and to bring in replenishment fuel from an offsite location.

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The specified fuel oil inventory for the Unit 1 emergency diesel generators (EDGs) is in addition to the fuel oil inventory specified for the diesel driven cooling water pumps (LCO 3.7.8) that must be available in the Unit 1 diesel fuel oil storage system. There are four Design Class I fuel oil storage tanks for the Unit 1 EDGs and two Design Class I fuel oil storage tanks for the diesel driven cooling water pumps. These six Design Class I tanks are interconnected such that any tank can be manually aligned to supply any Unit 1 EDG or diesel driven cooling water pump day tank. Any combination of inventory in these six tanks may be used to satisfy the inventory requirements for the Unit 1 EDGs and the diesel driven cooling water pumps. There are four Unit 2 Design Class I fuel oil storage tanks. The four Unit 2 tanks are interconnected such that any tank can be manually aligned to supply either Unit 2 EDG day tank. Any combination of inventory in these four Unit 2 tanks may be used to satisfy the Unit 2 EDG inventory requirements.

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(continued)

BASES

The 31 day Frequency is adequate to ensure that a sufficient supply of fuel oil is available, since low level alarms are provided and unit operators would be aware of any large uses of fuel oil during this period.

~~SR 3.8.3.2~~

~~This Surveillance ensures that sufficient lube oil inventory is available to support at least 7 days of full load~~

~~SURVEILLANCE~~ ~~SR 3.8.3.2 (continued)~~
~~REQUIREMENTS~~

~~operation for each DG. The [500] gal requirement is based on the DG manufacturer consumption values for the run time of the DG. Implicit in this SR is the requirement to verify the capability to transfer the lube oil from its storage location to the DG, when the DG lube oil sump does not hold adequate inventory for 7 days of full load operation without the level reaching the manufacturer recommended minimum level.~~

~~A 31 day Frequency is adequate to ensure that a sufficient lube oil supply is onsite, since DG starts and run time are closely monitored by the unit staff.~~

SR 3.8.3.32

The tests listed below for the new fuel oil prior to addition into the safeguards storage tank(s) are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate, detrimental impact on diesel engine combustion. If results from these tests are within acceptable limits, the fuel oil may be added to the safeguards storage tanks without concern for contaminating the entire volume of fuel oil in the safeguards storage

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tanks. These tests are to be conducted prior to adding the new fuel to the safeguards storage tank(s), but in no case is the time between

(continued)

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BASES

receipt of new fuel and conducting the tests to exceed 31 days. The tests, and limits, for new and stored fuel are and applicable ASTM Standards described in the Diesel Fuel Oil Testing Program of Specification 5.5.11. are as follows:

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a. ~~Sample the new fuel oil in accordance with ASTM D4057-[88] (Ref. 6);~~

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b. ~~Verify in accordance with the tests specified in ASTM D975-[77] (Ref. 6) that the sample has an absolute specific gravity at 60/60°F of ≥ 0.83 and ≤ 0.89 or an API gravity at 60°F of $\geq 27^\circ$ and $\leq 39^\circ$, a kinematic viscosity at 40°C of ≥ 1.9 centistokes and ≤ 4.1 centistokes, and a flash point of $\geq 125^\circ\text{F}$; and~~

c. ~~Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176-[] (Ref. 6).~~

SURVEILLANCE SR 3.8.3.3 (continued)
REQUIREMENTS

Failure to meet any of the above limits specified in the Diesel Fuel Oil Testing Program is cause for rejecting the new fuel oil, but does not represent a failure to meet the LCO concern since the fuel oil is not added to the storage tanks. Failure to meet any of the limits for stored fuel requires entry into Condition B.

~~Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975-[77] (Ref. 7) are met for new fuel oil when tested in accordance with ASTM D975-[77] (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1552-[] (Ref. 6) or ASTM D2622-[] (Ref. 6). The 31 day period is acceptable because the fuel oil properties of interest, even if they were not within stated limits, would not have an immediate~~

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(continued)

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BASES

~~effect on DG operation. This Surveillance ensures the availability of high quality fuel oil for the DGs.~~

~~Fuel oil degradation during long term storage shows up as an increase in particulate, due mostly to oxidation. The presence of particulate does not mean the fuel oil will not burn properly in a diesel engine. The particulate can cause fouling of filters and fuel oil injection equipment, however, which can cause engine failure.~~

~~Particulate concentrations should be determined in accordance with ASTM D2276-[], Method A (Ref. 6). This method involves a gravimetric determination of total particulate concentration in the fuel oil and has a limit of 10 mg/l. It is acceptable to obtain a field sample for subsequent laboratory testing in lieu of field testing. [For those designs in which the total stored fuel oil volume is contained in two or more interconnected tanks, each tank must be considered and tested separately.]~~

~~The Frequency of this test takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between Frequency intervals.~~

SURVEILLANCE
REQUIREMENTS
(continued)

~~SR 3.8.3.4~~

~~This Surveillance ensures that, without the aid of the refill compressor, sufficient air start capacity for each DG is available. The system design requirements provide for a minimum of [five] engine start cycles without recharging. [A start cycle is defined by the DG vendor, but usually is measured in terms of time (seconds of cranking) or engine cranking speed.] The pressure specified in this SR is intended to reflect the lowest value at which the [five] starts can be accomplished.~~

(continued)

BASES

~~The 31 day Frequency takes into account the capacity, capability, redundancy, and diversity of the AC sources and other indications available in the control room, including alarms, to alert the operator to below normal air start pressure.~~

SR 3.8.3.5

~~Microbiological fouling is a major cause of fuel oil degradation. There are numerous bacteria that can grow in fuel oil and cause fouling, but all must have a water environment in order to survive. Removal of water from the fuel storage tanks once every [31] days eliminates the necessary environment for bacterial survival. This is the most effective means of controlling microbiological fouling. In addition, it eliminates the potential for water entrainment in the fuel oil during DG operation. Water may come from any of several sources, including condensation, ground water, rain water, and contaminated fuel oil, and from breakdown of the fuel oil by bacteria. Frequent checking for and removal of accumulated water minimizes fouling and provides data regarding the watertight integrity of the fuel oil system. The Surveillance Frequencies are established by Regulatory Guide 1.137 (Ref. 2). This SR is for preventive maintenance. The presence of water does not necessarily represent failure of this SR, provided the accumulated water is removed during performance of the Surveillance.~~

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SURVEILLANCE
REQUIREMENTS
(continued)SR 3.8.3.6

~~Draining of the fuel oil stored in the supply tanks, removal of accumulated sediment, and tank cleaning are required at 10 year intervals by Regulatory Guide 1.137 (Ref. 2), paragraph 2.f. This SR also requires the performance of the ASME Code, Section XI (Ref. 8), examinations of the tanks. To preclude the introduction of surfactants in the fuel oil system, the cleaning should be accomplished using sodium hypochlorite solutions, or their equivalent, rather than soap or detergents. This SR is for preventive maintenance. The presence of sediment does not necessarily represent a failure of this SR, provided that accumulated sediment is removed during performance of the Surveillance.~~

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BASES

REFERENCES 1. FUSAR, Sections ~~[9.5-8.4 and 10.3.4.2]~~.

~~2. Regulatory Guide 1.137.~~

~~3. ANSI N195-1976, Appendix B.~~

~~24. FUSAR, Section [146].~~

~~5. FSAR, Chapter [15].~~

~~6. ASTM Standards: D4057-[]; D975-[77]; D4176-[];
D1552-[]; D2622-[]; D2276, Method A.~~

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~~7. ASTM Standards, D975, Table 1.~~

~~8. ASME, Boiler and Presser Vessel Code, Section XI.~~

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Difference Category	Difference Number	Justification for Differences
	3.8-	
PA	218	<p>NUREG-1431 LCO 3.8.3, Required Action D, has been revised by a Note stating, "Enter applicable Conditions and Required Actions of LCO 3.7.8, 'CL System' when Condition D is entered as a result of stored fuel oil properties not within limits". The requirements for diesel fuel oil volume have been divided into two separate specifications. ITS 3.7.8 provides diesel fuel oil volume for the diesel driven CL pumps and ITS 3.8.3 provides the requirements for the diesel generators. In addition, ITS 5.5.11 provides the requirements for the Diesel Fuel Oil Testing Program. Both the diesel driven CL pumps and the plant diesel generators share a common storage tank and fuel oil contents. ITS 3.8.3 provides requirements for testing the tank contents and associated Required Actions if the fuel oil properties are not restored to within limits. A Note was added to Condition D instructing the operators that if the diesel fuel oil in the storage tanks is not within limits, to enter the associated Conditions and Required Actions for the diesel driven CL pumps. This change provides consistency between the two systems and is consistent with current plant design and practices.</p>

Part G

PACKAGE 3.8

ELECTRICAL POWER SYSTEMS

NO SIGNIFICANT HAZARDS DETERMINATION AND ENVIRONMENTAL ASSESSMENT

NO SIGNIFICANT HAZARDS DETERMINATION

The proposed changes to the Operating License have been evaluated to determine whether they constitute a significant hazards consideration as required by 10CFR Part 50, Section 50.91 using the standards provided in Section 50.92.

For ease of review, the changes are evaluated in groupings according to the type of change involved. A single generic evaluation may suffice for some of the changes while others may require specific evaluation in which case the appropriate reference change numbers are provided.

A - Administrative (GENERIC NSHD)

(A3.8-01, A3.8-10, A3.8-13, A3.8-15, A3.8-17, A3.8-20, A3.8-22, A3.8-23, A3.8-25, A3.8-30, A3.8-38, A3.8-39, A3.8-40, A3.8-51, A3.8-53, A3.8-56, A3.8-57, A3.8-58, A3.8-60, A3.8-62 and A3.8-63, A3.8-68)

Most administrative changes have not been marked-up in the CTS, and may not be specifically referenced to a discussion of change (DOC). This NSHD may be referenced in a discussion of change by the suffix "A" if the change is not obviously an administrative change and requires an explanation.

These proposed changes are editorial in nature. They involve reformatting, renaming, renumbering, or rewording of existing TS to provide consistency with NUREG-1431 or conformance with the Writer's Guide, change of current plant terminology to conform to NUREG-1431 or change of NUREG-1431 terminology to conform to CTS. Some administrative changes involve relocation of requirements within the TS without affecting their technical content. Clarifications within the NEW PI ITS which do not impose new requirements on plant operation are also considered administrative.