

October 1, 2003

U. S. Nuclear Regulatory Commission  
Attention: R. E. Martin  
Washington, DC 20555

Subject: Duke Energy Corporation  
McGuire Nuclear Station, Units 1 and 2  
Docket Numbers 50-369 and 50-370  
Catawba Nuclear Station Units 1 and 2  
Docket Nos. 50-413, 50-414

Reference: Duke Energy Corporation letter of July 14,  
2003: Application for Technical  
Specification Improvement to Extend the  
Completion Time for Condition B of Technical  
Specification 3.5.1, "Accumulators," Using  
the Consolidated Line Item Improvement  
Process

Enclosed, please find reprinted McGuire Technical  
Specification page 3.5.1-1 and McGuire Technical  
Specification Bases pages B3.5.1-1 through B3.5.1-8; and  
reprinted Catawba Technical Specification page 3.5.1-1 and  
Catawba Technical Specification Bases pages B3.5.1-1  
through B3.5.1-8 which were affected by our proposed  
request of July 14, 2003. No additional changes have been  
made.

Please contact me at (704) 382-8688 if you have any  
questions in this matter.

Yours truly,



J. A. Effinger  
Licensing Specialist  
Nuclear Generation Department

A001

### 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

#### 3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,  
MODE 3 with RCS pressure > 1000 psig.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Reduce RCS pressure to $\leq 1000$ psig.	12 hours
D. Two or more accumulators inoperable.	D.1 Enter LCO 3.0.3.	Immediately

## B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

### B 3.5.1 Accumulators

#### BASES

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##### BACKGROUND

The functions of the ECCS accumulators are to supply water to the reactor vessel during the blowdown phase of a loss of coolant accident (LOCA), to provide inventory to help accomplish the refill phase that follows thereafter, and to provide Reactor Coolant System (RCS) makeup for a small break LOCA.

The blowdown phase of a large break LOCA is the initial period of the transient during which the RCS departs from equilibrium conditions, and heat from fission product decay, hot internals, and the vessel continues to be transferred to the reactor coolant. The blowdown phase of the transient ends when the RCS pressure falls to a value approaching that of the containment atmosphere.

In the refill phase of a LOCA, which immediately follows the blowdown phase, reactor coolant inventory has vacated the core through steam flashing and ejection out through the break. The core is essentially in adiabatic heatup. The balance of accumulator inventory is then available to help fill voids in the lower plenum and reactor vessel downcomer so as to establish a recovery level at the bottom of the core and ongoing reflood of the core with the addition of safety injection (SI) water.

The accumulators are pressure vessels partially filled with borated water and pressurized with nitrogen gas. The accumulators are passive components, since no operator or control actions are required in order for them to perform their function. Internal accumulator tank pressure is sufficient to discharge the accumulator contents to the RCS, if RCS pressure decreases below the accumulator pressure.

Each accumulator is piped into an RCS cold leg via an accumulator line and is isolated from the RCS by a motor operated isolation valve and two check valves in series. The motor operated isolation valves are interlocked by P-11 with the pressurizer pressure measurement channels to ensure that the valves will automatically open as RCS pressure increases to above the permissive circuit P-11 setpoint.

This interlock also prevents inadvertent closure of the valves during normal operation prior to an accident. The valves will automatically open, however, as a result of an SI signal. The isolation valves between the accumulators and the Reactor Coolant System are required to be open

## **BASES**

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### **BACKGROUND (continued)**

and power removed during unit operation. In that the subject valves are normally open and do not serve as an active device during a LOCA, the requirements of the Institute of Electrical and Electronic Engineers (IEEE) Standard 279-1971 (Ref. 1) is not applicable in this situation. Therefore, the subject valve control circuit is not designed to this standard.

The accumulator size, water volume, and nitrogen cover pressure are selected so that three of the four accumulators are sufficient to partially cover the core before significant clad melting or zirconium water reaction can occur following a LOCA. The need to ensure that three accumulators are adequate for this function is consistent with the LOCA assumption that the entire contents of one accumulator will be lost via the RCS pipe break during the blowdown phase of the LOCA.

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### **APPLICABLE SAFETY ANALYSES**

The accumulators are assumed OPERABLE in both the large and small break LOCA analyses at full power (Ref. 2). These are the Design Basis Accidents (DBAs) that establish the acceptance limits for the accumulators. Reference to the analyses for these DBAs is used to assess changes in the accumulators as they relate to the acceptance limits.

In performing the LOCA calculations, conservative assumptions are made concerning the availability of ECCS flow. In the early stages of a LOCA, with or without a loss of offsite power, the accumulators provide the sole source of makeup water to the RCS. The assumption of loss of offsite power is required by regulations and conservatively imposes a delay wherein the ECCS pumps cannot deliver flow until the emergency diesel generators start, come to rated speed, and go through their timed loading sequence. In cold leg break scenarios, the entire contents of one accumulator are assumed to be lost through the break.

The limiting large break LOCA is a double ended guillotine break at the discharge of the reactor coolant pump. During this event, the accumulators discharge to the RCS as soon as RCS pressure decreases to below accumulator pressure.

As a conservative estimate, no credit is taken for ECCS pump flow until an effective delay has elapsed. This delay accounts for the diesels starting, the valves opening, and the pumps being loaded and delivering full flow. The delay time is conservatively set with an additional 2 seconds to account for SI signal generation. During this time, the accumulators are analyzed as providing the sole source of emergency core cooling. No operator action is assumed during the blowdown stage of a large break LOCA.

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### APPLICABLE SAFETY ANALYSES (continued)

The worst case small break LOCA analyses also assume a time delay before pumped flow reaches the core. For the larger range of small breaks, the rate of blowdown is such that the increase in fuel clad temperature is terminated solely by the accumulators, with pumped flow then providing continued cooling. As break size decreases, the accumulators, safety injection pumps, and centrifugal charging pumps all play a part in terminating the rise in clad temperature. As break size continues to decrease, the role of the accumulators continues to decrease until they are not required and the centrifugal charging pumps become solely responsible for terminating the temperature increase.

This LCO helps to ensure that the following acceptance criteria established for the ECCS by 10 CFR 50.46 (Ref. 3) will be met following a small break LOCA and there is a high probability that the criteria are met following a large break LOCA:

- a. Maximum fuel element cladding temperature is  $\leq 2200^{\circ}\text{F}$ ;
- b. Maximum cladding oxidation is  $\leq 0.17$  times the total cladding thickness before oxidation;
- c. Maximum hydrogen generation from a zirconium water reaction is  $\leq 0.01$  times the hypothetical amount that would be generated if all of the metal in the cladding cylinders surrounding the fuel, excluding the cladding surrounding the plenum volume, were to react; and
- d. Core is maintained in a coolable geometry.

Since the accumulators discharge during the blowdown phase of a LOCA, they do not contribute directly to the long term cooling requirements of 10 CFR 50.46. However, the boron content of the accumulator water helps to maintain the reactor core subcritical after reflood, thereby eliminating fission heat as an energy source for which cooling must be provided.

For both the large and small break LOCA analyses, a nominal contained accumulator water volume is used. The contained water volume is the same as the deliverable volume for the accumulators, since the accumulators are emptied, once discharged. The large and small break LOCA analyses are performed with accumulator volumes that are consistent with the LOCA evaluation models. To allow for operating margin, values of  $\pm 31.5 \text{ ft}^3$  are specified.

## BASES

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### APPLICABLE SAFETY ANALYSES (continued)

The minimum boron concentration setpoint is used in the post LOCA sump boron concentration calculation. The calculation is performed to assure reactor subcriticality in a post LOCA environment. Of particular

interest is the large break LOCA, since no credit is taken for control rod assembly insertion. A reduction in the accumulator minimum boron concentration would produce a subsequent reduction in the available containment sump concentration for post LOCA shutdown and an increase in the maximum sump pH. The maximum boron concentration is used in determining the cold leg to hot leg recirculation injection switchover time and minimum sump pH.

The large and small break LOCA analyses are performed with accumulator pressures that are consistent with the LOCA evaluation models. To allow for operating margin and accumulator design limits, a range from 585 psig to 639 psig is specified. The maximum nitrogen cover pressure limit prevents accumulator relief valve actuation, and ultimately preserves accumulator integrity.

The effects on containment mass and energy releases from the accumulators are accounted for in the appropriate analyses (Ref. 4). The accumulators satisfy Criterion 3 of 10 CFR 50.36 (Ref. 5).

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### LCO

The LCO establishes the minimum conditions required to ensure that the accumulators are available to accomplish their core cooling safety function following a LOCA. Four accumulators are required to ensure that 100% of the contents of three of the accumulators will reach the core during a LOCA. This is consistent with the assumption that the contents of one accumulator spill through the break. If less than three accumulators are injected during the blowdown phase of a LOCA, the ECCS acceptance criteria of 10 CFR 50.46 (Ref. 3) could be violated.

For an accumulator to be considered OPERABLE, the isolation valve must be fully open, power removed above 1000 psig, and the limits established in the SRs for contained volume, boron concentration, and nitrogen cover pressure must be met. Additionally, the nitrogen and liquid volumes between accumulators must be physically separate.

## **BASES**

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### **APPLICABILITY**

In MODES 1 and 2, and in MODE 3 with RCS pressure > 1000 psig, the accumulator OPERABILITY requirements are based on full power operation. Although cooling requirements decrease as power decreases, the accumulators are still required to provide core cooling as long as elevated RCS pressures and temperatures exist.

This LCO is only applicable at pressures > 1000 psig. At pressures  $\leq$  1000 psig, the rate of RCS blowdown is such that the ECCS pumps can provide adequate injection to ensure that peak clad temperature remains below the 10 CFR 50.46 (Ref. 3) limit of 2200°F for small break LOCAs and there is a high level of probability that the peak cladding temperature does not exceed 2200°F for large break LOCAs.

In MODE 3, with RCS pressure  $\leq$  1000 psig, and in MODES 4, 5, and 6, the accumulator motor operated isolation valves are closed to isolate the accumulators from the RCS. This allows RCS cooldown and depressurization without discharging the accumulators into the RCS or requiring depressurization of the accumulators.

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### **ACTIONS**

#### **A.1**

If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this Condition, ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analysis techniques demonstrate that the accumulators do not discharge following a large main steam line break for the plant. Even if they do discharge, their impact is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

#### **B.1**

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 24 hours. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these

## BASES

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### ACTIONS (continued)

conditions, the 24 hours Completion Time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions. The 24 hours allowed to restore an inoperable accumulator to operable status is justified in WCAP-15049-A, Rev. 1 (Ref. 6)

#### C.1 and C.2

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and RCS pressure reduced to  $\leq 1000$  psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

#### D.1

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

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### SURVEILLANCE REQUIREMENTS

#### SR 3.5.1.1

Each accumulator valve should be verified to be fully open every 12 hours. This verification ensures that the accumulators are available for injection and ensures timely discovery if a valve should be less than fully open. If an isolation valve is not fully open, the rate of injection to the RCS would be reduced. Although a motor operated valve position should not change with power removed, a closed valve could result in not meeting accident analyses assumptions. This Frequency is considered reasonable in view of other administrative controls that ensure a mispositioned isolation valve is unlikely.

#### SR 3.5.1.2 and SR 3.5.1.3

Every 12 hours, borated water volume and nitrogen cover pressure are verified for each accumulator. This is typically performed using the installed control room indication. This Frequency is sufficient to ensure adequate injection during a LOCA. Because of the static design of the accumulator, a 12 hour Frequency usually allows the operator to identify

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### **SURVEILLANCE REQUIREMENTS (continued)**

changes before limits are reached. Operating experience has shown this Frequency to be appropriate for early detection and correction of off normal trends.

#### **SR 3.5.1.4**

The boron concentration should be verified to be within required limits for each accumulator every 31 days since the static design of the accumulators limits the ways in which the concentration can be changed. The 31 day Frequency is adequate to identify changes that could occur from mechanisms such as stratification or inleakage. Sampling the affected accumulator within 6 hours after a 1% tank volume increase will identify whether inleakage has caused a reduction in boron concentration to below the required limit. It is not necessary to verify boron concentration if the added water inventory is from the refueling water storage tank (RWST), because the water contained in the RWST is within the accumulator boron concentration requirements. This is consistent with the recommendation of NUREG-1366 (Ref. 7).

#### **SR 3.5.1.5**

Verification every 31 days that power is removed from each accumulator isolation valve operator (see Ref. 8) when the RCS pressure is > 1000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, only two accumulators would be available for injection given a single failure coincident with a LOCA. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

This SR allows power to be supplied to the motor operated isolation valves when RCS pressure is  $\leq$  1000 psig, thus allowing operational flexibility by avoiding unnecessary delays to manipulate the breakers during plant startups or shutdowns. Even with power supplied to the valves, inadvertent closure is prevented by the RCS pressure interlock associated with the valves.

Should closure of a valve occur in spite of the interlock, the SI signal provided to the valves would open a closed valve in the event of a LOCA.

**BASES**

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**REFERENCES**

1. IEEE Standard 279-1971.
2. UFSAR, Chapter 6.
3. 10 CFR 50.46.
4. DPC-NE-3004.
5. 10 CFR 50.36, Technical Specification, (c)(2)(ii).
6. WCAP - 15049-A, Rev. 1, April 1999
7. NUREG-1366, February 1990.
8. Duke letter to NRC, "Cold Leg Accumulator Isolation Valves", dated September 8, 1987

### 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

#### 3.5.1 Accumulators

LCO 3.5.1 Four ECCS accumulators shall be OPERABLE.

APPLICABILITY: MODES 1 and 2,  
MODE 3 with RCS pressure > 1000 psig.

#### ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One accumulator inoperable due to boron concentration not within limits.	A.1 Restore boron concentration to within limits.	72 hours
B. One accumulator inoperable for reasons other than Condition A.	B.1 Restore accumulator to OPERABLE status.	24 hours
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Reduce RCS pressure to $\leq$ 1000 psig.	12 hours
D. Two or more accumulators inoperable.	D.1 Enter LCO 3.0.3.	Immediately

## B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

### B 3.5.1 Accumulators

#### BASES

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##### BACKGROUND

The functions of the ECCS accumulators are to supply water to the reactor vessel during the blowdown phase of a loss of coolant accident (LOCA), to provide inventory to help accomplish the refill phase that follows thereafter, and to provide Reactor Coolant System (RCS) makeup for a small break LOCA.

The blowdown phase of a large break LOCA is the initial period of the transient during which the RCS departs from equilibrium conditions, and heat from fission product decay, hot internals, and the vessel continues to be transferred to the reactor coolant. The blowdown phase of the transient ends when the RCS pressure falls to a value approaching that of the containment atmosphere.

In the refill phase of a LOCA, which immediately follows the blowdown phase, reactor coolant inventory has vacated the core through steam flashing and ejection out through the break. The core is essentially in adiabatic heatup. The balance of accumulator inventory is then available to help fill voids in the lower plenum and reactor vessel downcomer so as to establish a recovery level at the bottom of the core and ongoing reflood of the core with the addition of safety injection (SI) water.

The accumulators are pressure vessels partially filled with borated water and pressurized with nitrogen gas. The accumulators are passive components, since no operator or control actions are required in order for them to perform their function. Internal accumulator tank pressure is sufficient to discharge the accumulator contents to the RCS, if RCS pressure decreases below the accumulator pressure.

Each accumulator is piped into an RCS cold leg via an accumulator line and is isolated from the RCS by a motor operated isolation valve and two check valves in series. The motor operated isolation valves are interlocked by P-11 with the pressurizer pressure measurement channels to ensure that the valves will automatically open as RCS pressure increases to above the permissive circuit P-11 setpoint.

This interlock also prevents inadvertent closure of the valves during normal operation prior to an accident. The valves will automatically open, however, as a result of an SI signal. The isolation valves between the accumulators and the Reactor Coolant System are required to be open

## **BASES**

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### **BACKGROUND (continued)**

and power removed during unit operation. In that the subject valves are normally open and do not serve as an active device during a LOCA, the requirements of the Institute of Electrical and Electronic Engineers (IEEE) Standard 279-1971 (Ref. 1) is not applicable in this situation. Therefore, the subject valve control circuit is not designed to this standard.

The accumulator size, water volume, and nitrogen cover pressure are selected so that three of the four accumulators are sufficient to partially cover the core before significant clad melting or zirconium water reaction can occur following a LOCA. The need to ensure that three accumulators are adequate for this function is consistent with the LOCA assumption that the entire contents of one accumulator will be lost via the RCS pipe break during the blowdown phase of the LOCA.

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### **APPLICABLE SAFETY ANALYSES**

The accumulators are assumed OPERABLE in both the large and small break LOCA analyses at full power (Ref. 2). These are the Design Basis Accidents (DBAs) that establish the acceptance limits for the accumulators. Reference to the analyses for these DBAs is used to assess changes in the accumulators as they relate to the acceptance limits.

In performing the LOCA calculations, conservative assumptions are made concerning the availability of ECCS flow. In the early stages of a LOCA, with or without a loss of offsite power, the accumulators provide the sole source of makeup water to the RCS. The assumption of loss of offsite power is required by regulations and conservatively imposes a delay wherein the ECCS pumps cannot deliver flow until the emergency diesel generators start, come to rated speed, and go through their timed loading sequence. In cold leg break scenarios, the entire contents of one accumulator are assumed to be lost through the break.

The limiting large break LOCA is a double ended guillotine break at the discharge of the reactor coolant pump. During this event, the accumulators discharge to the RCS as soon as RCS pressure decreases to below accumulator pressure.

As a conservative estimate, no credit is taken for ECCS pump flow until an effective delay has elapsed. This delay accounts for the diesels starting, the valves opening, and the pumps being loaded and delivering full flow. The delay time is conservatively set with an additional 2 seconds to account for SI signal generation. During this time, the accumulators are analyzed as providing the sole source of emergency core cooling. No operator action is assumed during the blowdown stage of a large break LOCA.

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### **APPLICABLE SAFETY ANALYSES (continued)**

The worst case small break LOCA analyses also assume a time delay before pumped flow reaches the core. For the larger range of small breaks, the rate of blowdown is such that the increase in fuel clad temperature is terminated solely by the accumulators, with pumped flow then providing continued cooling. As break size decreases, the accumulators, safety injection pumps, and centrifugal charging pumps all play a part in terminating the rise in clad temperature. As break size continues to decrease, the role of the accumulators continues to decrease until they are not required and the centrifugal charging pumps become solely responsible for terminating the temperature increase.

This LCO helps to ensure that the following acceptance criteria established for the ECCS by 10 CFR 50.46 (Ref. 3) will be met following a small break LOCA and there is a high level of probability that the criteria are met following a large break LOCA:

- a. Maximum fuel element cladding temperature is  $\leq 2200^{\circ}\text{F}$ ;
- b. Maximum cladding oxidation is  $\leq 0.17$  times the total cladding thickness before oxidation;
- c. Maximum hydrogen generation from a zirconium water reaction is  $\leq 0.01$  times the hypothetical amount that would be generated if all of the metal in the cladding cylinders surrounding the fuel, excluding the cladding surrounding the plenum volume, were to react; and
- d. Core is maintained in a coolable geometry.

Since the accumulators discharge during the blowdown phase of a LOCA, they do not contribute directly to the long term cooling requirements of 10 CFR 50.46. However, the boron content of the accumulator water helps to maintain the reactor core subcritical after reflood, thereby eliminating fission heat as an energy source for which cooling must be provided.

For both the large and small break LOCA analyses, a nominal contained accumulator water volume is used. The contained water volume is the same as the deliverable volume for the accumulators, since the accumulators are emptied, once discharged. The large and small break LOCA analyses are performed with accumulator volumes that are consistent with the LOCA evaluation models. To allow for operating margin, values of  $\pm 30 \text{ ft}^3$  are specified.

The minimum boron concentration setpoint is used in the post LOCA sump boron concentration calculation. The calculation is performed to

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### **APPLICABLE SAFETY ANALYSES (continued)**

assure reactor subcriticality in a post LOCA environment. Of particular interest is the large break LOCA, since no credit is taken for control rod assembly insertion. A reduction in the accumulator minimum boron concentration would produce a subsequent reduction in the available containment sump concentration for post LOCA shutdown and an increase in the maximum sump pH. The maximum boron concentration is used in determining the cold leg to hot leg recirculation injection switchover time and minimum sump pH. In particular, the equilibrium sump pH should be at least 7.5 following the design basis LOCA.

The large and small break LOCA analyses are performed with accumulator pressures that are consistent with the LOCA evaluation models. To allow for operating margin and accumulator design limits, a range from 585 psig to 678 psig is specified. The maximum nitrogen cover pressure limit prevents accumulator relief valve actuation, and ultimately preserves accumulator integrity.

The effects on containment mass and energy releases from the accumulators are accounted for in the appropriate analyses (Ref. 4).

The accumulators satisfy Criterion 3 of 10 CFR 50.36 (Ref. 5).

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### **LCO**

The LCO establishes the minimum conditions required to ensure that the accumulators are available to accomplish their core cooling safety function following a LOCA. Four accumulators are required to ensure that 100% of the contents of three of the accumulators will reach the core during a LOCA. This is consistent with the assumption that the contents of one accumulator spill through the break. If less than three accumulators are injected during the blowdown phase of a LOCA, the ECCS acceptance criteria of 10 CFR 50.46 (Ref. 3) could be violated.

For an accumulator to be considered OPERABLE, the isolation valve must be fully open, power removed above 1000 psig, and the limits established in the SRs for contained volume, boron concentration, and nitrogen cover pressure must be met. Additionally, the nitrogen and liquid volumes between accumulators must be physically separate.

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### **APPLICABILITY**

In MODES 1 and 2, and in MODE 3 with RCS pressure > 1000 psig, the accumulator OPERABILITY requirements are based on full power operation. Although cooling requirements decrease as power decreases, the accumulators are still required to provide core cooling as long as elevated RCS pressures and temperatures exist.

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### APPLICABILITY (continued)

This LCO is only applicable at pressures > 1000 psig. At pressures  $\leq 1000$  psig, the rate of RCS blowdown is such that the ECCS pumps can provide adequate injection to ensure that peak clad temperature remains below the 10 CFR 50.46 (Ref. 3) limit of 2200°F for small break LOCAs and there is a high level of probability that the peak cladding temperature does not exceed 2200°F for large break LOCAs.

In MODE 3, with RCS pressure  $\leq 1000$  psig, and in MODES 4, 5, and 6, the accumulator motor operated isolation valves are closed to isolate the accumulators from the RCS. This allows RCS cooldown and depressurization without discharging the accumulators into the RCS or requiring depressurization of the accumulators.

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### ACTIONS

#### A.1

If the boron concentration of one accumulator is not within limits, it must be returned to within the limits within 72 hours. In this Condition, ability to maintain subcriticality or minimum boron precipitation time may be reduced. The boron in the accumulators contributes to the assumption that the combined ECCS water in the partially recovered core during the early reflooding phase of a large break LOCA is sufficient to keep that portion of the core subcritical. One accumulator below the minimum boron concentration limit, however, will have no effect on available ECCS water and an insignificant effect on core subcriticality during reflood. Boiling of ECCS water in the core during reflood concentrates boron in the saturated liquid that remains in the core. In addition, current analysis techniques demonstrate that the accumulators do not discharge following a large main steam line break for the plant. Even if they do discharge, their impact is minor and not a design limiting event. Thus, 72 hours is allowed to return the boron concentration to within limits.

#### B.1

If one accumulator is inoperable for a reason other than boron concentration, the accumulator must be returned to OPERABLE status within 24 hours. In this Condition, the required contents of three accumulators cannot be assumed to reach the core during a LOCA. Due to the severity of the consequences should a LOCA occur in these conditions, the 24 hour Completion Time to open the valve, remove power to the valve, or restore the proper water volume or nitrogen cover pressure ensures that prompt action will be taken to return the inoperable accumulator to OPERABLE status. The Completion Time minimizes the potential for exposure of the plant to a LOCA under these conditions.

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## **BASES**

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### **ACTIONS (continued)**

The 24 hours allowed to restore an inoperable accumulator to OPERABLE status is justified in WCAP-15049-A, Rev. 1 (Ref. 6).

#### **C.1 and C.2**

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to MODE 3 within 6 hours and RCS pressure reduced to  $\leq$  1000 psig within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

#### **D.1**

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

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### **SURVEILLANCE REQUIREMENTS**

#### **SR 3.5.1.1**

Each accumulator valve should be verified to be fully open every 12 hours. This verification ensures that the accumulators are available for injection and ensures timely discovery if a valve should be less than fully open. If an isolation valve is not fully open, the rate of injection to the RCS would be reduced. Although a motor operated valve position should not change with power removed, a closed valve could result in not meeting accident analyses assumptions. This Frequency is considered reasonable in view of other administrative controls that ensure a mispositioned isolation valve is unlikely.

#### **SR 3.5.1.2 and SR 3.5.1.3**

Every 12 hours, borated water volume and nitrogen cover pressure are verified for each accumulator. This is typically performed using the installed control room indication. This Frequency is sufficient to ensure adequate injection during a LOCA. Because of the static design of the accumulator, a 12 hour Frequency usually allows the operator to identify changes before limits are reached. Operating experience has shown this

## **BASES**

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### **SURVEILLANCE REQUIREMENTS (continued)**

Frequency to be appropriate for early detection and correction of off normal trends.

#### **SR 3.5.1.4**

The boron concentration should be verified to be within required limits for each accumulator every 31 days since the static design of the accumulators limits the ways in which the concentration can be changed. The 31 day Frequency is adequate to identify changes that could occur from mechanisms such as stratification or inleakage. Sampling the affected accumulator within 6 hours after a 75 gallon increase will identify whether inleakage has caused a reduction in boron concentration to below the required limit. It is not necessary to verify boron concentration if the added water inventory is from the refueling water storage tank (RWST), because the water contained in the RWST is within the accumulator boron concentration requirements. This is consistent with the recommendation of NUREG-1366 (Ref. 7).

#### **SR 3.5.1.5**

Verification every 31 days that power is removed from each accumulator isolation valve operators for NI54A, NI65B, NI76A, and NI88B when the RCS pressure is > 1000 psig ensures that an active failure could not result in the undetected closure of an accumulator motor operated isolation valve. If this were to occur, only two accumulators would be available for injection given a single failure coincident with a LOCA. Since power is removed and circuit breakers padlocked under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

This SR allows power to be supplied to the motor operated isolation valves when RCS pressure is  $\leq 1000$  psig, thus allowing operational flexibility by avoiding unnecessary delays to manipulate the breakers during plant startups or shutdowns. Even with power supplied to the valves, inadvertent closure is prevented by the RCS pressure interlock associated with the valves.

Should closure of a valve occur in spite of the interlock, the SI signal provided to the valves would open a closed valve in the event of a LOCA.