

## B 2.0 SAFETY LIMITS (SLs)

### B 2.1.1 Reactor Core SLs

#### BASES

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##### BACKGROUND

GDC 10 (Ref. 1) requires that specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and Anticipated Operational Occurrences (AOOs). This is accomplished by having a Departure from Nucleate Boiling (DNB) design basis, which corresponds to a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that DNB will not occur and by requiring that fuel centerline temperature stays below the melting temperature.

The restrictions of this SL prevent overheating of the fuel and cladding, as well as possible cladding perforation, that would result in the release of fission products to the reactor coolant. Overheating of the fuel is prevented by maintaining the steady state peak Linear Heat Rate (LHR) below the level at which fuel centerline melting occurs. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime, where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

Fuel centerline melting occurs when the local LHR, or power peaking, in a region of the fuel is high enough to cause the fuel centerline temperature to reach the melting point of the fuel. Expansion of the pellet upon centerline melting may cause the pellet to stress the cladding to the point of failure, allowing an uncontrolled release of activity to the reactor coolant.

BASES

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BACKGROUND (continued)

Operation above the boundary of the nucleate boiling regime could result in excessive cladding temperature because of the onset of DNB and the resultant sharp reduction in heat transfer coefficient. Inside the steam film, high cladding temperatures are reached, and a cladding water (zirconium water) reaction may take place. This chemical reaction results in oxidation of the fuel cladding to a structurally weaker form. This weaker form may lose its integrity, resulting in an uncontrolled release of activity to the reactor coolant.

The proper functioning of the Reactor Protection System (RPS) and Main Steam Safety Valves (MSSVs) prevents violation of the reactor core SLs.

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APPLICABLE  
SAFETY ANALYSES

The fuel cladding must not sustain damage as a result of normal operation and AOOs. The reactor core SLs are established to preclude violation of the following fuel design criteria:

- a. The hot fuel pellet in the core must not experience centerline fuel melting; and
- b. There must be at least 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience DNB.

The Reactor Trip System setpoints (Ref. 2) specified in LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation," in combination with all the LCOs, are designed to prevent any anticipated combination of transient conditions for Reactor Coolant System (RCS) highest loop average temperature, pressurizer pressure, and THERMAL POWER level that would result in a Departure from Nucleate Boiling Ratio (DNBR) of less than the DNBR limit and preclude the existence of flow instabilities.



BASES

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APPLICABLE SAFETY ANALYSES (continued)

Automatic enforcement of these reactor core SLs is provided by the following functions (Ref. 2):

- a. Pressurizer Pressure - high trip;
- b. Pressurizer Pressure - low trip;
- c. Overtemperature  $\Delta T$  trip;
- d. Overpower  $\Delta T$  trip;
- e. Power Range Neutron Flux trip;
- f. Low reactor coolant flow trip; and
- g. Main steam safety valves.

Additional trip functions are provided to backup these functions for specific abnormal conditions.

The limitation that the average enthalpy in the hot leg be less than or equal to the enthalpy of saturated liquid also ensures that the  $\Delta T$  measured by instrumentation, used in the RPS design as a measure of core power, is proportional to core power.

The SLs represent a design requirement for establishing the RPS trip setpoints identified previously. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits," or the assumed initial conditions of the safety analyses provide more restrictive limits to ensure that the SLs are not exceeded.

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SAFETY LIMITS

Figure B 2.1.1-1 shows an example of the reactor core safety limits of THERMAL POWER, RCS pressure, and average temperature for which the minimum DNBR is not less than the safety analyses limit, that fuel centerline temperature remains below melting, that the average enthalpy in the hot leg is less than or equal to the enthalpy of saturated liquid, or that the core exit quality is within the limits defined by the DNBR correlation.

BASES

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SAFETY LIMITS (continued)

The curves are typically derived based on enthalpy hot channel factor limits such as those provided in the COLR. The dashed line of Figure B 2.1.1-1 shows an example of a limit curve at 2235 psig. In addition, it illustrates the various RPS functions that are designed to prevent the unit from reaching the limit.

The SL is higher than the limit calculated when the Axial Flux Difference (AFD) is within the limits of the  $F_1(\Delta I)$  function of the Overtemperature  $\Delta T$  reactor trip. When the AFD is not within the tolerance, the AFD effect on the Overtemperature  $\Delta T$  reactor trips will reduce the setpoints to provide protection consistent with the reactor core SLs (Refs. 3 and 4).

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APPLICABILITY

SL 2.1.1 only applies in MODES 1 and 2 because these are the only MODES in which the reactor is critical. Automatic protection functions are required to be OPERABLE during MODES 1 and 2 to ensure operation within the reactor core SLs. The MSSVs or automatic protection actions serve to prevent RCS heatup to the reactor core SL conditions or to initiate a reactor trip function, which forces the unit into MODE 3. Setpoints for the reactor trip functions are specified in LCO 3.3.1. In MODES 3, 4, 5, and 6, Applicability is not required since the reactor is not generating significant THERMAL POWER.

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SAFETY LIMITS  
VIOLATIONS

If SL 2.1.1 is violated, the requirement to go to MODE 3 places the unit in a MODE in which this SL is not applicable.

The allowed Completion Time of 1 hour recognizes the importance of bringing the unit to a MODE of operation where this SL is not applicable, and reduces the probability of fuel damage.

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BASES

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 10.
2. UFSAR, Section 7.2.
3. WCAP-8746-A, March 1977.
4. WCAP-9273-NP-A, July 1985.

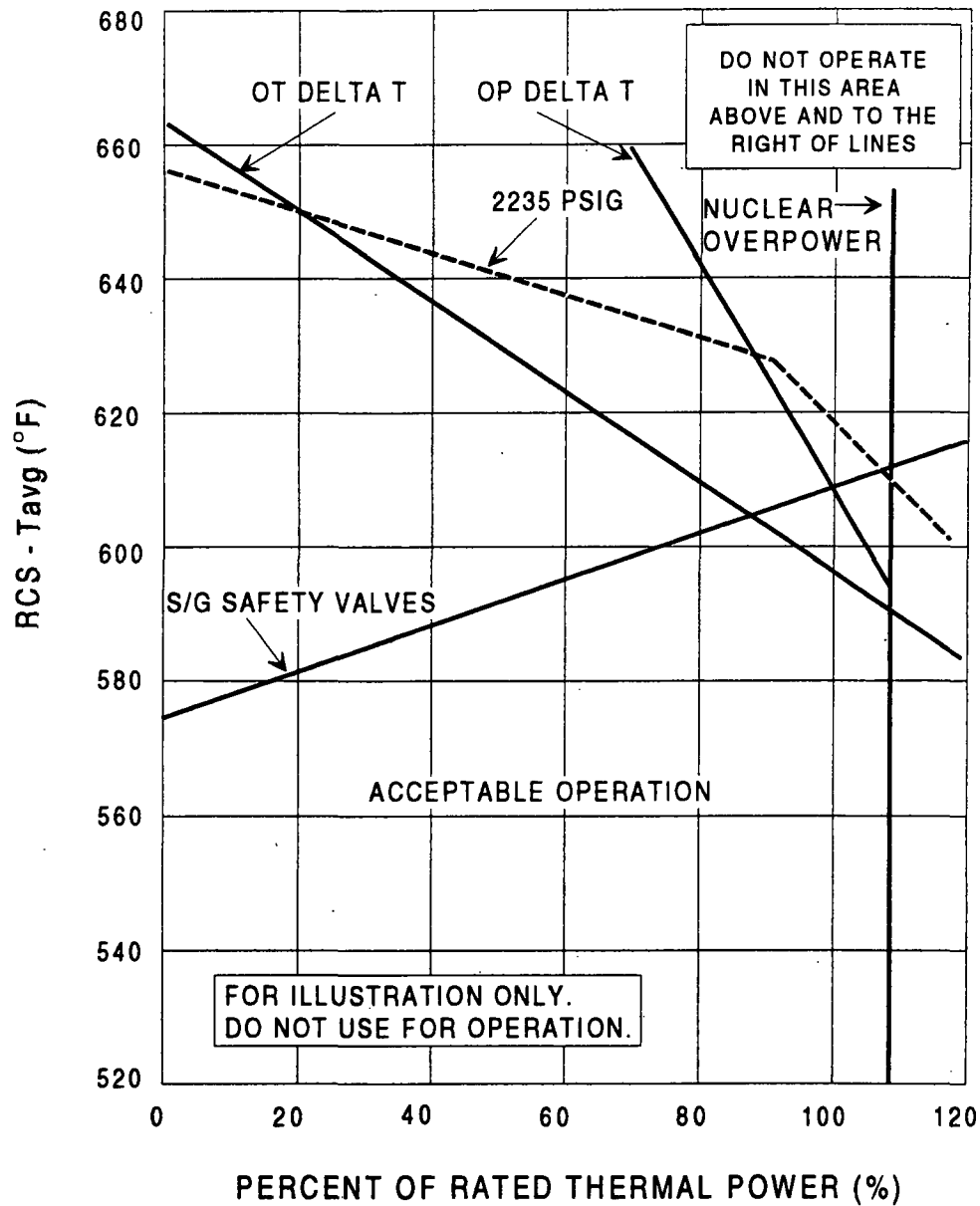


Figure B 2.1.1-1 (page 1 of 1)  
Reactor Core Safety Limits vs. Boundary of Protection

## B 2.0 SAFETY LIMITS (SLs)

### B 2.1.2 Reactor Coolant System (RCS) Pressure SL

#### BASES

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#### BACKGROUND

The SL on RCS pressure protects the integrity of the RCS against overpressurization. In the event of fuel cladding failure, fission products are released into the reactor coolant. The RCS then serves as the primary barrier in preventing the release of fission products into the atmosphere. By establishing an upper limit on RCS pressure, the continued integrity of the RCS is ensured. According to 10 CFR 50, Appendix A, GDC 14, "Reactor Coolant Pressure Boundary," and GDC 15, "Reactor Coolant System Design" (Ref. 1), the Reactor Coolant Pressure Boundary (RCPB) design conditions are not to be exceeded during normal operation and Anticipated Operational Occurrences (AOOs). Also, in accordance with GDC 28, "Reactivity Limits" (Ref. 1), reactivity accidents, including rod ejection, do not result in damage to the RCPB greater than limited local yielding.

The design pressure of the RCS is 2500 psia. During normal operation and AOOs, RCS pressure is limited from exceeding the design pressure by more than 10%, in accordance with SECTION III of the ASME Code (Ref. 2). To ensure system integrity, all RCS components are hydrostatically tested at 125% of design pressure, according to the ASME Code requirements prior to initial operation when there is no fuel in the core. Following inception of unit operation, RCS components are pressure tested, in accordance with the requirements of the approved ISI/IST Program which is based on ASME Code, SECTION XI (Ref. 3).

Overpressurization of the RCS could result in a breach of the RCPB reducing the number of protective barriers designed to prevent radioactive releases from exceeding the limits specified in 10 CFR 100, "Reactor Site Criteria" (Ref. 4). If such a breach occurs in conjunction with a fuel cladding failure, fission products could enter the containment atmosphere.

BASES

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APPLICABLE  
SAFETY ANALYSES

The pressurizer safety valves, the Main Steam Safety Valves (MSSVs), and the Pressurizer Pressure-High trip have settings established to ensure that the RCS pressure SL will not be exceeded.

The RCS pressurizer safety valves are sized to prevent system pressure from exceeding the design pressure by more than 10%, as specified in SECTION III of the ASME Code for Nuclear Power Plant Components (Ref. 2). The transient that establishes the required relief capacity, and hence valve size requirements and lift settings, is a complete loss of external load without a direct reactor trip. During the transient, no control actions are assumed, except that the MSSVs are assumed to open when the steam pressure reaches the safety valve settings, and nominal feedwater supply is maintained (Ref. 5).

The Reactor Trip System setpoints, together with the settings of the MSSVs, provide pressure protection for normal operation and AOOs. The Pressurizer Pressure-High trip setpoint is specifically set to provide protection against overpressurization (Ref. 6). The safety analyses for both the high pressure trip and the pressurizer safety valves are performed using conservative assumptions relative to pressure control devices (Ref. 5).

More specifically, no credit is taken for operation of the following:

- a. Pressurizer power operated relief valves;
- b. Steam Generator (SG) power operated relief valves;
- c. Steam Dump System;
- d. Reactor Control System;
- e. Pressurizer Level Control System; or
- f. Pressurizer spray valves.

BASES

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SAFETY LIMITS      The maximum transient pressure allowed in the RCS pressure vessel, pressurizer, and the RCS piping, valves, and fittings under the ASME Code, SECTION III, is 110% of design pressure. Therefore, the SL on maximum allowable RCS pressure is 2735 psig.

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APPLICABILITY      SL 2.1.2 applies in MODES 1, 2, 3, 4, and 5 because this SL could be approached or exceeded in these MODES due to overpressurization events. The SL is not applicable in MODE 6 because the reactor vessel head closure bolts are not fully tightened, making it unlikely that the RCS can be pressurized.

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SAFETY LIMIT VIOLATIONS      If SL 2.1.2, "RCS Pressure SL," is violated when the reactor is in MODE 1 or 2, the requirement is to restore compliance and be in MODE 3 within 1 hour.

Exceeding the RCS pressure SL may cause immediate RCS failure and create a potential for radioactive releases in excess of 10 CFR 100, "Reactor Site Criteria," limits (Ref. 4).

The allowable Completion Time of 1 hour recognizes the importance of reducing power level to a MODE of operation where the potential for challenges to safety systems is minimized. If the Completion Time is exceeded, actions shall continue in order to restore compliance with the SL and bring the unit to MODE 3.

BASES

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SAFETY LIMIT VIOLATIONS (continued)

If SL 2.1.2 is exceeded in MODE 3, 4, or 5, RCS pressure must be restored to within the SL value within 5 minutes. Exceeding the RCS pressure SL in MODE 3, 4, or 5 is more severe than exceeding this SL in MODE 1 or 2, since the reactor vessel temperature may be lower and the vessel material, consequently, less ductile. As such, pressure must be reduced to less than the SL within 5 minutes. If the Completion Time is exceeded, actions shall continue in order to reduce pressure to less than the SL. The action does not require reducing MODES, since this would require reducing temperature, which would compound the problem by adding thermal gradient stresses to the existing pressure stress.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 14, GDC 15, and GDC 28.
2. ASME, Boiler and Pressure Vessel Code, SECTION III, Article NB-7000.
3. ASME, Boiler and Pressure Vessel Code, SECTION XI.
4. 10 CFR 100.
5. UFSAR, Section 5.2.2.
6. UFSAR, Section 7.2.



## B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

### BASES

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LCOs                      LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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LCO 3.0.1                LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

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LCO 3.0.2                LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

BASES

LCO 3.0.2 (continued)

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Condition no longer exists. In this instance, the individual LCO's ACTIONS specify the Required Actions. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

BASES

LCO 3.0.2 (continued)

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Alternatives that would not result in redundant equipment being inoperable should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time other conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable and the new LCO is not met. In this case, the Completion Times of the new Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

BASES

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LCO 3.0.3      LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies; or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no single Condition or combination of Conditions stated in the ACTIONS can be made that corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted. In such cases, the Conditions corresponding to such combinations state that LCO 3.0.3 shall be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a unit upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

BASES

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LCO 3.0.3 (continued)

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met.
- b. A Condition exists for which the Required Actions have now been performed.
- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of LCO 3.0.3 allow 37 hours from MODE 1, 2, 3, or 4 for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

BASES

LCO 3.0.3 (continued)

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, "Spent Fuel Pool Water Level." LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.14 of "Suspend movement of irradiated fuel assemblies in the spent fuel pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a different MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

BASES

LCO 3.0.4 (continued)

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

BASES

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LCO 3.0.4 (continued)

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

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LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this LCO is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.



BASES

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LCO 3.0.5 (continued)

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

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LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

BASES

LCO 3.0.6 (continued)

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.15, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

BASES

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LCO 3.0.7      There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Exception LCOs (e.g., LCO 3.1.8, "PHYSICS TESTS Exceptions-MODE 2") allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of an Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Exception LCO, the requirements of the Exception LCO shall be followed.

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LCO 3.0.8      LCO 3.0.8 establishes the applicability of each Specification to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.

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B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

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SRs                      SR 3.0.1 through SR 3.0.5 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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SR 3.0.1                SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a.    The systems or components are known to be inoperable, although still meeting the SRs; or
- b.    The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with an Exception LCO are only applicable when the Exception LCO is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

BASES

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SR 3.0.1 (continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

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SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers unit operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

BASES

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SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is the Containment Leakage Rate Testing Program. The requirements of regulations take precedence over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

BASES

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SR 3.0.3 SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a delay period for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions or a reactor trip.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

BASES

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SR 3.0.3 (continued)

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.



BASES

SR 3.0.4 (continued)

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, train, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

BASES

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SR 3.0.4 (continued)

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

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SR 3.0.5

SR 3.0.5 establishes the applicability of each Surveillance to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified with parenthetical reference, Notes, or other appropriate presentation within the SR.

## B 3.1 REACTIVITY CONTROL SYSTEMS

## B 3.1.1 SHUTDOWN MARGIN (SDM)

BASES

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## BACKGROUND

According to GDC 26 (Ref. 1), the reactivity control systems must be redundant and capable of holding the reactor core subcritical when shut down under cold conditions. Maintenance of the SDM ensures that postulated reactivity events will not damage the fuel.

SDM requirements provide sufficient reactivity margin to ensure that acceptable fuel design limits will not be exceeded for normal shutdown and Anticipated Operational Occurrences (AOOs). As such, the SDM defines the degree of subcriticality that would be obtained immediately following the insertion of all shutdown and control rods, assuming that the single Rod Cluster Control Assembly (RCCA) of highest reactivity worth is fully withdrawn.

The system design requires that two independent reactivity control systems be provided, and that one of these systems be capable of maintaining the core subcritical under cold conditions. These requirements are provided by the use of movable RCCAs and soluble boric acid in the Reactor Coolant System (RCS). The Rod Control System can compensate for the reactivity effects of the fuel and water temperature changes accompanying power level changes over the range from full load to no load. In addition, the Rod Control System, together with the boration system, provides the SDM during power operation and is capable of making the core subcritical rapidly enough to prevent exceeding acceptable fuel damage limits, assuming that the rod of highest reactivity worth remains fully withdrawn. The Chemical and Volume Control System can control the soluble boron concentration to compensate for fuel depletion during operation and all xenon burnout reactivity changes and maintain the reactor subcritical under cold conditions.

During power operation, SDM control is ensured by operating with the shutdown banks fully withdrawn and the control banks within the limits of LCO 3.1.6, "Control Bank Insertion Limits." When the unit is in the shutdown and refueling modes, the SDM requirements are met by means of adjustments to the RCS boron concentration.

BASES

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APPLICABLE  
SAFETY ANALYSES

The minimum required SDM is assumed as an initial condition in the safety analyses. The safety analysis establishes an SDM that ensures specified acceptable fuel design limits are not exceeded for normal operation and AOOs, with the assumption of the highest worth rod stuck out on a reactor trip.

The acceptance criteria for the SDM requirements are that specified acceptable fuel design limits are not exceeded. This is done by ensuring that:

- a. The reactor can be made subcritical from all operating conditions, transients, and Design Basis Accidents;
- b. The reactivity transients associated with postulated accident conditions are controllable within acceptable limits (Departure from Nucleate Boiling Ratio (DNBR)); and fuel centerline temperature limits for AOOs; and
- c. The reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

The most limiting accident for the SDM requirements is based on a Main Steam Line Break (MSLB) at zero power with no decay heat, as described in the accident analysis (Ref. 2). The increased steam flow resulting from a pipe break in the main steam system causes an increased energy removal from the affected Steam Generator (SG), and consequently the RCS. This results in a reduction of the reactor coolant temperature. The resultant coolant shrinkage causes a reduction in pressure. In the presence of a negative moderator temperature coefficient, this cooldown causes an increase in core reactivity. As RCS temperature decreases, the severity of an MSLB decreases until the MODE 5 value is reached. The most limiting MSLB, with respect to potential fuel damage before a reactor trip occurs, is a double ended break of a main steam line inside containment initiated at the end of core life. The positive reactivity addition from the moderator temperature decrease will terminate when the affected SG boils dry, thus terminating RCS heat removal and cooldown. Following the MSLB, a post trip return to power may occur; however, no fuel damage occurs as a result of the post trip return to power, and THERMAL POWER does not violate the Safety Limit (SL) requirement of SL 2.1.1.

## BASES

## APPLICABLE SAFETY ANALYSES (continued)

For MODE 5, the primary safety analysis that relies on the SDM limits is the boron dilution analysis. In the boron dilution analysis (Ref. 3), the required SDM defines the reactivity difference between an initial subcritical boron concentration and the corresponding critical boron concentration. These values, in conjunction with the configuration of the RCS and the assumed dilution flow rate, directly affect the results of the analysis. This event is most limiting at the beginning of core life, when critical boron concentrations are highest.

In addition to the limiting MSLB and boron dilution transients, the SDM requirement must also protect against:

- a. An uncontrolled RCCA bank withdrawal condition; and
- b. RCCA ejection accidents.

Each of these events is discussed below.

Depending on the system initial conditions and reactivity insertion rate, the uncontrolled RCCA withdrawal transient is terminated by a high neutron flux, high pressurizer pressure, high pressurizer water level, OTAT, or OPAT reactor trip (Ref. 4 and Ref. 5). In all cases, power level, RCS pressure, linear heat rate, and the DNBR do not exceed allowable limits.

The ejection of an RCCA (Ref. 6) rapidly adds positive reactivity to the reactor core, causing both the core power level and heat flux to increase with corresponding increases in reactor coolant temperatures and pressure. The ejection of an RCCA also produces a time dependent redistribution of core power.

SDM satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii). Even though it is not directly observed from the control room, SDM is considered an initial condition process variable because it is periodically monitored to ensure that the unit is operating within the bounds of accident analysis assumptions.

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BASES

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## LCO

SDM is a core design condition that can be ensured during operation through control rod positioning (control and shutdown banks) and through the soluble boron concentration.

The MSLB (Ref. 2) and the boron dilution (Ref. 3) accidents are the most limiting analyses that establish the SDM value of the LCO. For MSLB accidents, if the LCO is violated, there is a potential to exceed the DNBR limit and to exceed 10 CFR 100, "Reactor Site Criteria," limits (Ref. 7). For the boron dilution accident, if the LCO is violated, the minimum required time assumed for operator action to terminate dilution may no longer be applicable.

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## APPLICABILITY

In MODE 2 with  $k_{\text{eff}} < 1.0$  and MODES 3, 4, and 5, the SDM requirements are applicable to provide sufficient negative reactivity to meet the assumptions of the safety analyses discussed above. In MODE 6, the shutdown reactivity requirements are given in LCO 3.9.1, "Boron Concentration." In MODE 1 and MODE 2 with  $k_{\text{eff}} \geq 1.0$ , SDM is ensured by complying with LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits."

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## ACTIONS

A.1

If the SDM requirements are not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. It is assumed that boration will be continued until the SDM requirements are met.

In the determination of the required combination of boration flow rate and boron concentration, there is no unique requirement that must be satisfied. Since it is imperative to raise the boron concentration of the RCS as soon as possible, the boron concentration should be a highly concentrated solution, such as that normally found in the boric acid storage tank or the refueling water storage tank. The operator should borate with the best source available for the unit conditions.

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## BASES

## ACTIONS (continued)

In determining the boration flow rate, the time in core life must be considered. For instance, the most difficult time in core life to increase the RCS boron concentration is at the beginning of life when the boron concentration may approach or exceed 2000 ppm. Assuming that a value of 1%  $\Delta k/k$  must be recovered and a boration flow rate of 30 gpm, it is possible to increase the boron concentration of the RCS by 123 ppm in approximately 74 minutes assuming a 7000 ppm boric acid solution. If a boron worth of 8.12 pcm/ppm is assumed, this combination of parameters will increase the SDM by 1%  $\Delta k/k$ . These boration parameters of 30 gpm and 7000 ppm represent typical values and are provided for the purpose of offering a specific example.

SURVEILLANCE  
REQUIREMENTSSR 3.1.1.1

In MODE 2 with  $k_{eff} < 1.0$  and MODES 3, 4, and 5, the SDM is verified by performing a reactivity balance calculation, considering the listed reactivity effects:

- a. RCS boron concentration;
- b. Control bank position;
- c. RCS average temperature;
- d. Fuel burnup based on gross thermal energy generation;
- e. Xenon concentration;
- f. Samarium concentration; and
- g. Isothermal Temperature Coefficient (ITC).

Using the ITC accounts for Doppler reactivity in this calculation because the reactor is subcritical, and the fuel temperature will be changing at the same rate as the RCS. The SDM limits are specified in the COLR.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Frequency of 24 hours is based on the generally slow change in required boron concentration and the low probability of an accident occurring without the required SDM. This allows time for the operator to collect the required data, which includes performing a boron concentration analysis, and complete the calculation.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
2. UFSAR, Section 15.1.5.
3. UFSAR, Section 15.4.6.
4. UFSAR, Section 15.4.1.
5. UFSAR, Section 15.4.2.
6. UFSAR, Section 15.4.8.
7. 10 CFR 100.



## B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.2 Core Reactivity

#### BASES

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##### BACKGROUND

According to GDC 26, GDC 28, and GDC 29 (Ref. 1), reactivity shall be controllable, such that subcriticality is maintained under cold conditions, and acceptable fuel design limits are not exceeded during normal operation and anticipated operational occurrences. Therefore, reactivity balance is used as a measure of the predicted versus measured core reactivity during power operation. The periodic confirmation of core reactivity is necessary to ensure that Design Basis Accident (DBA) and transient safety analyses remain valid. A large reactivity difference could be the result of unanticipated changes in fuel, control rod worth, or operation at conditions not consistent with those assumed in the predictions of core reactivity, and could potentially result in a loss of Shutdown Margin (SDM) or violation of acceptable fuel design limits. Comparing predicted versus measured core reactivity validates the nuclear methods used in the safety analysis and supports the SDM demonstrations (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") in ensuring the reactor can be brought safely to cold, subcritical conditions.

When the reactor core is critical or in normal power operation, a reactivity balance exists and the net reactivity is zero. A comparison of predicted and measured reactivity is convenient under such a balance, since parameters are being maintained relatively stable under steady state power conditions. The positive reactivity inherent in the core design is balanced by the negative reactivity of the control components, thermal feedback, neutron leakage, and materials in the core that absorb neutrons, such as burnable absorbers producing zero net reactivity. Excess reactivity can be inferred from the boron letdown curve (or critical boron curve), which provides an indication of the soluble boron concentration in the Reactor Coolant System (RCS) versus cycle burnup. Periodic measurement of the RCS boron concentration for comparison with the predicted value with other variables fixed or stable (such as rod height, temperature, pressure, and power), provides a convenient method of ensuring that core reactivity is within design expectations and that the calculational models used to generate the safety analysis are adequate.

BASES

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BACKGROUND (continued)

In order to achieve the required fuel cycle energy output, the uranium enrichment, in the new fuel loading and in the fuel remaining from the previous cycle, provides excess positive reactivity beyond that required to sustain steady state operation throughout the cycle. When the reactor is critical at RATED THERMAL POWER (RTP) and normal operating temperature, the excess positive reactivity is compensated by burnable absorbers (if any), control rods, whatever neutron poisons (mainly xenon and samarium) are present in the fuel, and the RCS boron concentration.

When the core is producing THERMAL POWER, the fuel is being depleted and excess reactivity is decreasing. As the fuel depletes, the RCS boron concentration is reduced to decrease negative reactivity and maintain constant THERMAL POWER. The boron letdown curve is based on steady state operation at RTP. Therefore, deviations from the predicted boron letdown curve may indicate deficiencies in the design analysis, deficiencies in the calculational models, or abnormal core conditions, and must be evaluated.

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APPLICABLE  
SAFETY ANALYSES

The acceptance criteria for core reactivity are that the reactivity balance limit ensures plant operation is maintained within the assumptions of the safety analyses.

Accurate prediction of core reactivity is either an explicit or implicit assumption in the accident analysis evaluations. Every accident evaluation (Ref. 2) is, therefore, dependent upon accurate evaluation of core reactivity. In particular, SDM and reactivity transients, such as control rod withdrawal accidents or rod ejection accidents, are very sensitive to accurate prediction of core reactivity. These accident analysis evaluations rely on computer codes that have been qualified against available test data, operating plant data, and analytical benchmarks. Monitoring reactivity balance additionally ensures that the nuclear methods provide an accurate representation of the core reactivity.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

Design calculations and safety analyses are performed for each fuel cycle for the purpose of predetermining reactivity behavior and the RCS boron concentration requirements for reactivity control during fuel depletion.

The comparison between measured and predicted initial core reactivity provides a normalization for the calculational models used to predict core reactivity. If the measured and predicted RCS boron concentrations for identical core conditions at Beginning Of Life (BOL) do not agree, then the assumptions used in the reload cycle design analysis or the calculational models used to predict soluble boron requirements may not be accurate. If reasonable agreement between measured and predicted core reactivity exists at BOL, then the prediction may be normalized to the measured boron concentration. Thereafter, any significant deviations in the measured boron concentration from the predicted boron letdown curve that develop during fuel depletion may be an indication that the calculational model is not adequate for core burnups beyond BOL, or that an unexpected change in core conditions has occurred.

The normalization of predicted RCS boron concentration to the measured value is typically performed after reaching RTP following startup from a refueling outage, with the control rods in their normal positions for power operation. The normalization is performed at BOL conditions, so that core reactivity relative to predicted values can be continually monitored and evaluated as core conditions change during the cycle.

Core reactivity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

Long term core reactivity behavior is a result of the core physics design and cannot be easily controlled once the core design is fixed. During operation, therefore, the LCO can only be ensured through measurement and tracking, and appropriate actions taken as necessary. Large differences between actual and predicted core reactivity may indicate that the assumptions of the DBA and transient analyses are no longer valid, or that the uncertainties in the Nuclear Design Methodology are larger than expected. A limit on the reactivity balance of  $\pm 1\% \Delta k/k$  has been established based on engineering judgment. A 1% deviation in reactivity from that predicted is larger than expected for normal operation and should therefore be evaluated.

When measured core reactivity is within  $1\% \Delta k/k$  of the predicted value at steady state thermal conditions, the core is considered to be operating within acceptable design limits. Since deviations from the limit are normally detected by comparing predicted and measured steady state RCS critical boron concentrations, the difference between measured and predicted values would be approximately 100 ppm (depending on the boron worth) before the limit is reached. These values are well within the uncertainty limits for analysis of boron concentration samples, so that spurious violations of the limit due to uncertainty in measuring the RCS boron concentration are unlikely.

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### APPLICABILITY

The limits on core reactivity must be maintained during MODES 1 and 2 because a reactivity balance must exist when the reactor is critical or producing THERMAL POWER. As the fuel depletes, core conditions are changing, and confirmation of the reactivity balance ensures the core is operating as designed. This Specification does not apply in MODES 3, 4, and 5 because the reactor is shut down and the reactivity balance is not changing.

In MODE 6, fuel loading results in a continually changing core reactivity. Boron concentration requirements (LCO 3.9.1, "Boron Concentration") ensure that fuel movements are performed within the bounds of the safety analysis. An SDM demonstration is required during the first startup following operations that could have altered core reactivity (e.g., fuel movement, control rod replacement, control rod shuffling).

BASES

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ACTIONS

A.1 and A.2

Should an anomaly develop between measured and predicted core reactivity, an evaluation of the core design and safety analysis must be performed. Core conditions are evaluated to determine their consistency with input to design calculations. Measured core and process parameters are evaluated to determine that they are within the bounds of the safety analysis, and safety analysis calculational models are reviewed to verify that they are adequate for representation of the core conditions. The required Completion Time of 7 days is based on the low probability of a DBA occurring during this period, and allows sufficient time to assess the physical condition of the reactor and complete the evaluation of the core design and safety analysis.

Following evaluations of the core design and safety analysis, the cause of the reactivity anomaly may be resolved. If the cause of the reactivity anomaly is a mismatch in core conditions at the time of RCS boron concentration sampling, then a recalculation of the RCS boron concentration requirements may be performed to demonstrate that core reactivity is behaving as expected. If an unexpected physical change in the condition of the core has occurred, it must be evaluated and corrected, if possible. If the cause of the reactivity anomaly is in the calculation technique, then the calculational models must be revised to provide more accurate predictions. If any of these results are demonstrated, and it is concluded that the reactor core is acceptable for continued operation, then the boron letdown curve may be renormalized and power operation may continue. If operational restriction or additional SRs are necessary to ensure the reactor core is acceptable for continued operation, then they must be defined.

The required Completion Time of 7 days is adequate for preparing whatever operating restrictions or Surveillances that may be required to allow continued reactor operation.

BASES

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ACTIONS (continued)

B.1

If the core reactivity cannot be restored to within the 1%  $\Delta k/k$  limit, 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 at least MODE 3 within 6 hours. If the SDM for MODE 3 is not met, then the boration required by SR 3.1.1.1 would occur. The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.2.1

Core reactivity is verified by periodic comparisons of measured and predicted RCS boron concentrations. The comparison is made considering that other core conditions are fixed or stable, including control rod position, moderator temperature, fuel temperature, fuel depletion, xenon concentration, and samarium concentration. The Surveillance is performed prior to entering MODE 1 after each refueling as an initial check on core conditions and design calculations at BOL.

SR 3.1.2.2

Core reactivity is verified by periodic comparisons of measured and predicted RCS boron concentrations. The comparison is made considering that other core conditions are fixed or stable, including control rod position, moderator temperature, fuel temperature, fuel depletion, xenon concentration, and samarium concentration. The required Frequency of 31 Effective Full Power Days (EFPD) is acceptable based on the slow rate of core changes due to fuel depletion and the presence of other indicators (QPTR, AFD, etc.) for prompt indication of an anomaly.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The SR is modified by two Notes. Note 1 states that the SR is only required to be performed after 60 EFPD. Note 2 indicates that the normalization of predicted core reactivity to the measured value may take place within the first 60 EFPD after each fuel loading. This allows sufficient time for core conditions to reach steady state, but prevents operation for a large fraction of the fuel cycle without establishing a benchmark for the design calculations.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 26, GDC 28, and GDC 29.
2. UFSAR, Chapter 15.

BASES

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## B 3.1 REACTIVITY CONTROL SYSTEMS

## B 3.1.3 Moderator Temperature Coefficient (MTC)

BASES

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## BACKGROUND

According to GDC 11 (Ref. 1), the reactor core and its interaction with the Reactor Coolant System (RCS) must be designed for inherently stable power operation, even in the possible event of an accident. In particular, the net reactivity feedback in the system must compensate for any unintended reactivity increases.

The MTC relates a change in core reactivity to a change in reactor coolant temperature (a positive MTC means that reactivity increases with increasing moderator temperature; conversely, a negative MTC means that reactivity decreases with increasing moderator temperature). The reactor is designed to operate with a negative MTC over the largest possible range of fuel cycle operation. Therefore, a coolant temperature increase will cause a reactivity decrease, so that the coolant temperature tends to return toward its initial value. Reactivity increases that cause a coolant temperature increase will thus be self limiting, and stable power operation will result.

MTC values are predicted at selected burnups during the safety evaluation analysis and are confirmed to be acceptable by measurements. The actual value of the MTC is dependent on core characteristics, such as fuel loading and reactor coolant soluble boron concentration. The core design may require additional fixed distributed poisons to yield an MTC at Beginning Of Life (BOL) within the range analyzed in the plant accident analysis. The End Of Life (EOL) MTC is also limited by the requirements of the accident analysis. Fuel cycles that are designed to achieve high burnups or that have changes to other characteristics are evaluated to ensure that the MTC does not exceed the EOL limit.

The limitations on MTC are provided to ensure that the value of this coefficient remains within the limiting conditions assumed in the UFSAR accident and transient analyses.

BASES

BACKGROUND (continued)

If the LCO limits are not met, the unit response during transients may not be as predicted. The core could violate criteria that prohibit a return to criticality, or the departure from nucleate boiling ratio criteria of the approved correlation may be violated, which could lead to a loss of the fuel cladding integrity.

The SRs for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits since this coefficient changes slowly, due principally to the reduction in RCS boron concentration associated with fuel burnup.

APPLICABLE  
SAFETY ANALYSES

The acceptance criteria for the specified MTC are:

- a. The MTC values must remain within the bounds of those used in the accident analysis (Ref. 2); and
- b. The MTC must be such that inherently stable power operations result during normal operation and accidents, such as overheating and overcooling events.

Additionally, the limitation on MTC also ensures that the Anticipated Transient Without Scram (ATWS) risk is acceptable. A cycle specific Unfavorable Exposure Time (UET) value will be calculated to ensure < 5% of the cycle operations occur when the reactivity feedback is not sufficient to prevent exceeding an ATWS overpressurization condition of  $\geq 3200$  psig in the RCS. This UET value will be updated for each core reload and appropriately considers the effects of changes in MTC, including any variations that are more adverse than those originally modeled in the analyses supporting the basis for the final ATWS rule.

## BASES

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APPLICABLE SAFETY ANALYSES (continued)

Reference 2 contains analyses of accidents that result in both overheating and overcooling of the reactor core. MTC is one of the controlling parameters for core reactivity in these accidents. Both the most positive value and most negative value of the MTC are important to safety, and both values must be bounded. Values used in the analyses consider worst case conditions to ensure that the accident results are bounding (Ref. 3).

The consequences of accidents that cause core overheating must be evaluated when the MTC is positive. Such accidents include the rod withdrawal transient from either zero or RTP, loss of main feedwater flow, and loss of forced reactor coolant flow. The consequences of accidents that cause core overcooling must be evaluated when the MTC is negative. Such accidents include sudden feedwater flow increase and sudden decrease in feedwater temperature.

In order to ensure a bounding accident analysis, the MTC is assumed to be its most limiting value for the analysis conditions appropriate to each accident. The bounding value is determined by considering rodded and unrodded conditions, whether the reactor is at full or zero power, and whether it is the BOL or EOL. The most conservative combination appropriate to the accident is then used for the analysis (Ref. 2).

MTC values are bounded in reload safety evaluations assuming steady state conditions at BOL and EOL. An EOL measurement is conducted at conditions when the RCS boron concentration reaches approximately 300 ppm. The measured value may be extrapolated to project the EOL value, in order to confirm reload design predictions.

MTC satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii). Even though it is not directly observed and controlled from the control room, MTC is considered an initial condition process variable because of its dependence on boron concentration.

## BASES

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### LCO

LCO 3.1.3 requires the MTC to be within specified limits of the COLR to ensure that the core operates within the assumptions of the accident analysis. During the reload core safety evaluation, the MTC is analyzed to determine that its values remain within the bounds of the original accident analysis during operation.

Assumptions made in safety analyses require that the MTC be less positive than a given upper bound and more positive than a given lower bound. The MTC is most positive at BOL; this upper bound must not be exceeded. This maximum upper limit occurs at BOL, All Rods Out (ARO), hot zero power conditions. At EOL the MTC takes on its most negative value, when the lower bound becomes important. This LCO exists to ensure that both the upper and lower bounds are not exceeded.

During operation, therefore, the conditions of the LCO can only be ensured through measurement. The Surveillance checks at BOL and EOL on MTC provide confirmation that the MTC is behaving as anticipated so that the acceptance criteria are met.

The LCO establishes a maximum positive value that cannot be exceeded. The BOL positive limit and the EOL negative limit are established in the COLR to allow specifying limits for each particular cycle. The COLR typically imposes a more restrictive upper limit than the bounding value of Figure 3.1.3-1. This permits the unit to take advantage of improved fuel management and changes in unit operating schedule.

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### APPLICABILITY

Technical Specifications place both LCO and SR values on MTC, based on the safety analysis assumptions described above.

## BASES

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APPLICABILITY (continued)

In MODE 1, the limits on MTC must be maintained to ensure that any accident initiated from THERMAL POWER operation will not violate the design assumptions of the accident analysis. In MODE 2 with the reactor critical, the upper limit must also be maintained to ensure that startup and subcritical accidents (such as the uncontrolled Rod Cluster Control Assembly (RCCA) withdrawal accident) will not violate the assumptions of the accident analysis. The lower MTC limit must be maintained in MODES 2 and 3, in addition to MODE 1, to ensure that cooldown accidents will not violate the assumptions of the accident analysis. In MODES 4, 5, and 6, this LCO is not applicable, since no Design Basis Accidents using the MTC as an analysis assumption are initiated from these MODES.

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ACTIONSA.1

If the BOL MTC limit is violated, administrative withdrawal limits for control banks must be established to maintain the MTC within its limits. These withdrawal limits shall be in addition to the insertion limits of LCO 3.1.6, "Control Bank Insertion Limits." The MTC becomes more negative with control bank insertion and decreased boron concentration. A Completion Time of 24 hours provides enough time for evaluating the MTC measurement and computing the required control bank withdrawal limits.

As cycle burnup is increased, the RCS boron concentration will be reduced. The reduced boron concentration causes the MTC to become more negative. Using physics calculations, the time in cycle life at which the calculated MTC will meet the LCO requirement can be determined. At this point in core life Condition A no longer exists. The unit is no longer in the Required Action, so the administrative withdrawal limits are no longer in effect.

BASES

ACTIONS (continued)

B.1

If the required administrative withdrawal limits at BOL are not established within 24 hours, the unit must be brought to MODE 2 with  $k_{eff} < 1.0$  to prevent operation with an MTC that is more positive than that assumed in safety analyses.

The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

C.1

Exceeding the EOL MTC limit means that the safety analysis assumptions for the EOL accidents that use a bounding negative MTC value may be invalid. If the EOL MTC limit is exceeded, the unit must be brought to a MODE or condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 4 within 12 hours.

The allowed Completion Time of 12 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE  
REQUIREMENTS

SR 3.1.3.1

This SR requires measurement of the MTC at BOL prior to entering MODE 1 in order to demonstrate compliance with the most positive MTC LCO. Entry into the MODEs or other specified conditions (i.e., MODE 2 with  $k_{eff} \geq 1.0$ ) is acceptable provided MTC is required to be within the upper limit prior to entering MODE 1. Meeting the limit prior to entering MODE 1 ensures that the limit will also be met at higher power levels.

## BASES

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SURVEILLANCE REQUIREMENTS (continued)

The BOL MTC value for ARO will be inferred from isothermal temperature coefficient measurements obtained during the physics tests after refueling. The ARO value can be directly compared to the BOL MTC limit of the LCO. If required, measurement results and predicted design values can be used to establish administrative withdrawal limits for control banks.

SR 3.1.3.2

In a similar fashion, the LCO demands that the MTC be less negative than the specified value for EOL full power conditions. This measurement may be performed at any THERMAL POWER, but its results must be extrapolated to the conditions of RTP and all banks withdrawn in order to make a proper comparison with the LCO value. Because the RTP MTC value will gradually become more negative with further core depletion and boron concentration reduction, a 300 ppm SR value of MTC should necessarily be less negative than the EOL LCO limit. The 300 ppm SR value is sufficiently less negative than the EOL LCO limit value to ensure that the LCO limit will be met when the 300 ppm Surveillance criterion is met.

The SR is modified by three Notes. Note 1 indicates that the SR is not required to be performed until 7 Effective Full Power Days (EFPD) after reaching the equivalent of an equilibrium RTP all rods out (ARO) boron concentration of 300 ppm. Note 2 indicates that if the 300 ppm Surveillance limit is exceeded, it is possible that the EOL limit on MTC could be reached before the planned EOL. Because the MTC changes slowly with core depletion, the Frequency of 14 EFPD is sufficient to avoid exceeding the EOL limit. Note 3 indicates that the Surveillance limit for RTP boron concentration of 60 ppm is conservative. If the measured MTC at 60 ppm is more positive than the 60 ppm Surveillance limit, the EOL limit will not be exceeded because of the gradual manner in which MTC changes with core burnup.

BASES

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 11.
2. UFSAR, Chapter 15.
3. WCAP-9273-NP-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.



B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.4 Rod Group Alignment Limits

BASES

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BACKGROUND

The OPERABILITY (i.e., trippability) of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumptions of available SDM.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Plants" (Ref. 2).

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. Control rod inoperability or misalignment may cause increased power peaking due to the asymmetric reactivity distribution, and a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on control rod alignment have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

Rod Cluster Control Assemblies (RCCAs), or rods, are moved by their Control Rod Drive Mechanisms (CRDMs). Each CRDM moves its RCCA one step (approximately  $\frac{5}{8}$  inch) at a time, but at varying rates (steps per minute) depending on the signal output from the Rod Control System.

BASES

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BACKGROUND (continued)

The 53 RCCAs are divided among four control banks and five shutdown banks. A bank of RCCAs consists of either one group, or, two groups that are moved in a staggered fashion to provide for precise reactivity control but which are always within one step of each other. Each of the control banks are divided into two groups, for a total of 25 control bank rods. Shutdown banks A and B are also divided into two groups, however, shutdown banks C, D and E have only one group each, for a total of 28 shutdown bank rods. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously.

The shutdown banks are maintained either in the fully inserted or fully withdrawn position. The control banks are moved in an overlap pattern, using the following withdrawal sequence: When control bank A reaches a predetermined height in the core, control bank B begins to move out with control bank A. Control bank A stops at the fully withdrawn position, and control bank B continues to move out. When control bank B reaches a predetermined height, control bank C begins to move out with control bank B. This sequence continues until control banks A, B, and C are at the fully withdrawn position, and control bank D is approximately halfway withdrawn. The insertion sequence is the opposite of the withdrawal sequence. The control rods are arranged in a radially symmetric pattern, so that control bank motion does not introduce radial asymmetries in the core power distributions.

The axial position of shutdown rods and control rods is indicated by two separate and independent systems, the Bank Demand Position Indication System (commonly called group step counters) and the Digital Rod Position Indication (DRPI) System.

BASES

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BACKGROUND (continued)

The Bank Demand Position Indication System counts the pulses from the rod control system that moves the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise ( $\pm 1$  step or  $\pm \frac{5}{8}$  inch) but not very reliable because it is a demanded position indication, not an actual position indication. For example, if a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

The DRPI System provides a highly accurate indication of actual control rod position, but at a lower precision than the step counters. This system is based on inductive analog signals from a series of coils spaced along a hollow tube with a center to center distance of 3.75 inches, which is six steps. To increase the reliability of the system, the inductive coils are connected alternately to data system A or B. Thus, if one system fails, the DRPI will go on half accuracy with an effective coil spacing of 7.5 inches, which is 12 steps. Therefore, the normal indication accuracy of the DRPI System is  $\pm 6$  steps ( $\pm 3.75$  inches), and the maximum uncertainty is  $\pm 12$  steps ( $\pm 7.5$  inches). With an indicated deviation of 12 steps between the group step counter and DRPI, the maximum deviation between actual rod position and the demand position could be 24 steps, or 15 inches.

BASES

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APPLICABLE  
SAFETY ANALYSES

Control rod misalignment accidents are analyzed in the safety analysis (Ref. 3). The acceptance criteria for addressing control rod inoperability or misalignment are that:

- a. There be no violations of:
  - 1. specified acceptable fuel design limits, or
  - 2. Reactor Coolant System (RCS) pressure boundary integrity; and
- b. The core remains subcritical after accident transients.

Two types of misalignment are distinguished. During movement of a control rod group, one rod may stop moving, while the other rods in the group continue (i.e., statically misaligned RCCA). This condition may cause excessive power peaking. The second type of misalignment occurs if one rod fails to insert upon a reactor trip and remains stuck fully withdrawn. This condition requires an evaluation to determine that sufficient reactivity worth is held in the control rods to meet the SDM requirement, with the maximum worth rod stuck fully withdrawn.

Two types of analysis are performed in regard to static rod misalignment (Ref. 4). With control banks at their insertion limits, one type of analysis considers the case when any one rod is completely inserted into the core. The second type of analysis considers the case with control bank D inserted to its full power insertion limit and one RCCA fully withdrawn. Satisfying limits on departure from nucleate boiling ratio in both of these cases bounds the situation when a rod is misaligned from its group by 12 steps.

Another type of misalignment occurs if one RCCA fails to insert upon a reactor trip and remains stuck fully withdrawn. This condition is assumed in the evaluation to determine that the required SDM is met with the maximum worth RCCA fully withdrawn (Ref. 5).

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The Required Actions in this LCO ensure that either deviations from the alignment limits will be corrected or that THERMAL POWER will be adjusted so that excessive local Linear Heat Rates (LHRs) will not occur, and that the requirements on SDM and ejected rod worth are preserved.

Continued operation of the reactor with a misaligned control rod is allowed if the heat flux hot channel factor ( $F_Q(Z)$ ) and the nuclear enthalpy rise hot channel factor ( $F_{\Delta H}^N$ ) are verified to be within their limits in the COLR and the safety analysis is verified to remain valid. When a control rod is misaligned, the assumptions that are used to determine the rod insertion limits, AFD limits, and quadrant power tilt limits are not preserved. Therefore, the limits may not preserve the design peaking factors, and  $F_Q(Z)$  and  $F_{\Delta H}^N$  must be verified directly by incore mapping. Bases Section 3.2 (Power Distribution Limits) contains more complete discussions of the relation of  $F_Q(Z)$  and  $F_{\Delta H}^N$  to the operating limits.

Shutdown and control rod OPERABILITY and alignment are directly related to power distributions and SDM, which are initial conditions assumed in safety analyses. Therefore they satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The limits on shutdown or control rod alignments ensure that the assumptions in the safety analysis will remain valid. The requirements on OPERABILITY ensure that upon reactor trip, the assumed reactivity will be available and will be inserted. The OPERABILITY requirements (i.e. trippability to meet SDM) are separate from the alignment requirements, which ensure that the RCCAs and banks maintain the correct power distribution and rod alignment. The rod OPERABILITY requirement is satisfied provided the rod will fully insert in the required rod drop time assumed in the safety analysis. Rod control malfunctions that result in the inability to move rods (e.g. rod urgent failures), but do not impact trippability, do not result in rod inoperability provided proper alignment.

BASES

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LCO (continued)

The requirement to maintain individual indicated rod positions within 12 steps of their group step counter demand position is conservative. The minimum misalignment assumed in safety analysis is 24 steps (15 inches), and in some cases a total misalignment from fully withdrawn to fully inserted is assumed.

Failure to meet the requirements of this LCO may produce unacceptable power peaking factors and LHRs, or unacceptable SDMs, all of which may constitute initial conditions inconsistent with the safety analysis.

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APPLICABILITY

The requirements on RCCA OPERABILITY and alignment are applicable in MODES 1 and 2 because these are the only MODES in which neutron (or fission) power is generated, and the OPERABILITY (i.e., trippability) and alignment of rods have the potential to affect the safety of the plant. In MODES 3, 4, 5, and 6, the alignment limits do not apply because the control rods are fully inserted and the reactor is shut down and not producing fission power. In the shutdown MODES, the OPERABILITY of the shutdown and control rods has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the RCS. See LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," for SDM in MODES 3, 4, and 5 and LCO 3.9.1, "Boron Concentration," for boron concentration requirements for MODE 6.

BASES

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ACTIONS

A.1.1 and A.1.2

When one or more rods are inoperable (i.e., untrippable), there is a possibility that the required SDM may be adversely affected. Under these conditions, it is important to determine the SDM, and if it is less than the required value specified in the COLR, initiate boration until the required SDM is recovered. The Completion Time of 1 hour is adequate for determining SDM and, if necessary, for initiating boration to restore SDM to within limit.

In this situation, SDM verification must account for the worth of the untrippable rod(s), as well as the rod of maximum worth.

A.2

If the inoperable rod(s) cannot be restored to OPERABLE status, the unit must be brought to a MODE or condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

B.1.1 and B.1.2

When a rod becomes misaligned, it can usually be moved and is still trippable. If the rod can be realigned within 1 hour, local xenon redistribution during this short interval will not be significant, and operation may proceed without further restriction.

An alternative to realigning a single misaligned RCCA to the group average position is to align the remainder of the group to the position of the misaligned RCCA. However, this must be done without violating the bank sequence, overlap, and insertion limits specified in LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits." One hour gives the operator sufficient time to adjust the rod positions in an orderly manner.

BASES

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ACTIONS (continued)

However, in many cases, realigning the remainder of the group to the misaligned rod may not be desirable. For example, realigning control bank B to a rod that is misaligned 15 steps from the top of the core would require a significant power reduction, since control bank D must be fully inserted and control bank C must be partially inserted.

With a misaligned rod, SDM must be verified to be within limit (specified in the COLR) or boration must be initiated to restore SDM to within limit.

Power operation may continue with one RCCA trippable but misaligned, provided that SDM is verified within 1 hour.

The Completion Time of 1 hour represents the time necessary for determining the actual unit SDM and, if necessary, aligning and starting the necessary systems and components to initiate boration to restore SDM to within limit.

B.2, B.3, B.4, B.5, and B.6

For continued operation with a misaligned rod, THERMAL POWER must be reduced, SDM must periodically be verified within limits (specified in the COLR), hot channel factors ( $F_0(Z)$  and  $F_{\Delta H}^N$ ) must be verified within limits, and the safety analyses must be re-evaluated to confirm continued operation is permissible.

Reduction of power to 75% RTP ensures that local LHR increases due to a misaligned RCCA will not cause the core design criteria to be exceeded (Ref. 4). The Completion Time of 2 hours gives the operator sufficient time to accomplish an orderly power reduction without challenging the Reactor Protection System.

When a rod is known to be misaligned, there is a potential to impact the SDM. Since the core conditions can change with time, periodic verification of SDM is required. A Frequency of 12 hours is sufficient to ensure this requirement continues to be met.



BASES

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ACTIONS (continued)

Verifying that  $F_0(Z)$  and  $F_{\Delta H}^N$  are within the required limits ensures that current operation at 75% RTP with a rod misaligned is not resulting in power distributions that may invalidate safety analysis assumptions at full power. The Completion Time of 72 hours allows sufficient time to obtain flux maps of the core power distribution using the incore flux mapping system and to calculate  $F_0(Z)$  and  $F_{\Delta H}^N$ .

Once current conditions have been verified acceptable, time is available to perform evaluations of accident analysis to determine that core limits will not be exceeded during a Design Basis Accident for the duration of operation under these conditions. A Completion Time of 5 days is sufficient time to obtain the required input data and to perform the analysis.

Accident analyses (Ref. 3) requiring re-evaluation for continued operation with a misaligned rod include:

1. Increase in heat removal by the secondary system:
  - a. Excessive increase in secondary steam flow,
  - b. Inadvertent opening of a steam generator power operated relief or safety valve, and
  - c. Steam system piping failure;
2. Uncontrolled RCCA bank withdrawal at power;
3. RCCA misoperation:
  - a. One or more dropped RCCAs within the same group,
  - b. A dropped RCCA bank,
  - c. Statically misaligned RCCA, and
  - d. Withdrawal of a single RCCA;
4. RCCA ejection accidents; and
5. Loss of coolant accidents resulting from postulated piping breaks within the reactor coolant pressure boundary.

BASES

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ACTIONS (continued)

C.1

When Required Actions of Condition B cannot be completed within their Completion Time, the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours, which obviates concerns about the development of undesirable xenon or power distributions. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging the plant systems.

D.1.1 and D.1.2

More than one control rod becoming misaligned from its group average position is not expected, and has the potential to reduce SDM. Therefore, SDM (specified in the COLR) must be evaluated. One hour allows the operator adequate time to determine SDM. Restoration of the required SDM, if necessary, requires increasing the RCS boron concentration to provide negative reactivity, as described in the Bases of LCO 3.1.1. The required Completion Time of 1 hour for initiating boration is reasonable, based on the time required for potential xenon redistribution, the low probability of an accident occurring, and the steps required to complete the action. This allows the operator sufficient time to align the required valves and start the boric acid pumps. Boration will continue until the required SDM is restored.

D.2

If more than one rod is found to be misaligned or becomes misaligned because of bank movement, the unit conditions fall outside of the accident analysis assumptions. Since automatic bank sequencing would continue to cause misalignment, the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours.

BASES

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ACTIONS (continued)

The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.4.1

Verification that individual rod positions are within alignment limits at a Frequency of 12 hours provides a history that allows the operator to detect a rod that is beginning to deviate from its expected position. This frequency takes into account other rod position information that is continuously available to the operator in the control room, so that during actual rod motion, deviations can immediately be detected.

SR 3.1.4.2

Verifying each control rod is OPERABLE would require that each rod be tripped. However, in MODES 1 and 2, tripping each control rod would result in radial or axial power tilts, or oscillations. Exercising each individual control rod every 92 days provides increased confidence that all rods continue to be OPERABLE without exceeding the alignment limit, even if they are not regularly tripped. Moving each control rod by 10 steps will not cause radial or axial power tilts, or oscillations, to occur. The 92 day Frequency takes into consideration other information available to the operator in the control room and SR 3.1.4.1, which is performed more frequently and adds to the determination of OPERABILITY of the rods. Between required performances of SR 3.1.4.2 (determination of control rod OPERABILITY by movement), if a control rod(s) is discovered to be immovable, but remains trippable, the control rod(s) is considered to be OPERABLE. At any time, if a control rod(s) is immovable (e.g., as a result of excessive friction, mechanical interference, or rod control system failure), a determination of the trippability (OPERABILITY) of the control rod(s) must be made, and appropriate action taken.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.4.3

Verification of rod drop times allows the operator to determine that the maximum rod drop time permitted is consistent with the assumed rod drop time used in the safety analysis. Measuring rod drop times once prior to reactor criticality, after reactor vessel head removal, ensures that the reactor internals and rod drive mechanism will not interfere with rod motion or rod drop time, and that no degradation in these systems has occurred that would adversely affect control rod motion or drop time. This testing is performed with all Reactor Coolant Pumps (RCPs) operating and the average moderator temperature  $\geq 550^{\circ}\text{F}$  to ensure that the measured drop times will be representative of insertion times experienced during a reactor trip at operating conditions.

This Surveillance is performed during a unit outage, due to conditions needed to perform the SR and the potential for an unplanned unit transient if the Surveillance were performed with the reactor at power.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 10 and GDC 26.
2. 10 CFR 50.46.
3. UFSAR, Chapter 15.
4. UFSAR, Section 15.4.3.
5. UFSAR, Section 15.1.5.

## B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.5 Shutdown Bank Insertion Limits

#### BASES

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##### BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in all safety analyses that assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available ejected rod worth, SDM and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The 53 Rod Cluster Control Assemblies (RCCAs) are divided among 4 control banks and 5 shutdown banks. A bank of RCCAs consists of either one group, or, two groups that are moved in a staggered fashion to provide for precise reactivity control but which are always within one step of each other. Each of the control banks are divided into two groups, for a total of 25 control bank rods. Shutdown banks A and B are also divided into two groups, however, shutdown banks C, D, and E have only one group each, for a total of 28 shutdown bank rods. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously (see LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod OPERABILITY and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements).

BASES

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BACKGROUND (continued)

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally automatically controlled by the Rod Control System, but they can also be manually controlled. They are capable of adding negative reactivity very quickly (compared to borating). The control banks must be maintained above designed insertion limits and are typically near the fully withdrawn position during normal full power operations.

Hence, they are not capable of adding a large amount of positive reactivity. Boration or dilution of the Reactor Coolant System (RCS) compensates for the reactivity changes associated with large changes in RCS temperature. The design calculations are performed with the assumption that the shutdown banks are withdrawn first. The shutdown banks can be fully withdrawn without the core going critical. This provides available negative reactivity in the event of boration errors. The shutdown banks are controlled manually by the control room operator. During normal unit operation, the shutdown banks are either above the insertion limits specified in the COLR or fully inserted. The shutdown banks must be above the insertion limits specified in the COLR prior to withdrawing any control banks during an approach to criticality, and are then left in this position until the reactor is shut down. They affect core power and burnup distribution, and add negative reactivity to shut down the reactor upon receipt of a reactor trip signal.

BASES

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APPLICABLE  
SAFETY ANALYSES

On a reactor trip, all RCCAs (shutdown banks and control banks), except the most reactive RCCA, are assumed to insert into the core. The shutdown banks shall be at or above their insertion limits and available to insert the maximum amount of negative reactivity on a reactor trip signal. The control banks may be partially inserted in the core, as allowed by LCO 3.1.6, "Control Bank Insertion Limits." The shutdown bank and control bank insertion limits are established to ensure that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") following a reactor trip from full power. The combination of control banks and shutdown banks (less the most reactive RCCA, which is assumed to be fully withdrawn) is sufficient to take the reactor from full power conditions at rated temperature to zero power, and to maintain the required SDM at rated no load temperature (Ref. 3). The shutdown bank insertion limit also limits the reactivity worth of an ejected shutdown rod.

The acceptance criteria for addressing shutdown and control bank insertion limits and inoperability or misalignment is that:

- a. There be no violations of:
  - 1. specified acceptable fuel design limits, or
  - 2. RCS pressure boundary integrity; and
- b. The core remains subcritical after accident transients.

As such, the shutdown bank insertion limits affect safety analysis involving core reactivity and SDM (Ref. 3).

The shutdown bank insertion limits preserve an initial condition assumed in the safety analyses and, as such, satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO

The shutdown banks must be within their insertion limits any time the reactor is critical or approaching criticality. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip.

The shutdown bank insertion limits are defined in the COLR.

The LCO has been modified by a Note indicating that the LCO requirement is suspended during the performance of SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the shutdown bank to move below the LCO limits, which would normally violate the LCO.

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APPLICABILITY

The shutdown banks must be within their insertion limits, with the reactor in MODES 1 and 2. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip. In MODE 3, 4, 5, or 6, the shutdown banks may be fully inserted in the core. Refer to LCO 3.1.1 for SDM requirements in MODES 3, 4, and 5. LCO 3.9.1, "Boron Concentration," ensures adequate SDM in MODE 6.

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ACTIONS

A.1.1, A.1.2, and A.2

When one or more shutdown banks is not within the insertion limits, 2 hours is allowed to restore the shutdown banks to within the insertion limits. Also, verification of SDM or initiation of boration within 1 hour is required, since the SDM in MODES 1 and 2 is ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1). If shutdown banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

The allowed Completion Time of 2 hours provides an acceptable time for evaluating and repairing minor problems without allowing the unit to remain in an unacceptable condition for an extended period of time.

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BASES

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ACTIONS (continued)

B.1

If Required Actions A.1 and A.2 and their associated Completion Times are not met, the unit must be brought to a MODE where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.5.1

Verification that the shutdown banks are within their insertion limits prior to an approach to criticality ensures that when the reactor is critical, or being taken critical, the shutdown banks will be available to shut down the reactor, and the required SDM will be maintained following a reactor trip. This SR and Frequency ensure that the shutdown banks are above the insertion limits specified in the COLR before the control banks are withdrawn during a unit startup.

Since the shutdown banks are positioned manually by the control room operator, a verification of shutdown bank position at a Frequency of 12 hours, after the reactor is taken critical, is adequate to ensure that they are within their insertion limits. Also, the 12 hour Frequency takes into account other information available in the control room for the purpose of monitoring the status of shutdown rods.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 10, GDC 26, and GDC 28.
2. 10 CFR 50.46.
3. UFSAR, Chapter 15.

BASES

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## B 3.1 REACTIVITY CONTROL SYSTEMS

### B 3.1.6 Control Bank Insertion Limits

#### BASES

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##### BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in all safety analyses that assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available SDM, and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The 53 Rod Cluster Control Assemblies (RCCAs) are divided among 4 control banks and 5 shutdown banks. A bank of RCCAs consists of either one group, or, two groups that are moved in a staggered fashion to provide for precise reactivity control but which are always within one step of each other. Each of the control banks are divided into two groups, for a total of 25 control bank rods. Shutdown banks A and B are also divided into two groups, however, shutdown banks C, D, and E have only one group each, for a total of 28 shutdown bank rods. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously (see LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod OPERABILITY and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements).

The control bank insertion limits are specified in a figure in the COLR. The control banks are required to be at or above the insertion limit lines.

BASES

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BACKGROUND (continued)

The insertion limits figure also indicates how the control banks are moved in an overlap pattern. Overlap is the distance travelled together by two control banks. This predetermined distance is defined in the COLR.

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally controlled automatically by the Rod Control System, but can also be manually controlled. They are capable of adding reactivity very quickly (compared to borating or diluting).

The power density at any point in the core must be limited, so that the fuel design criteria are maintained. Together, LCO 3.1.4, "Rod Group Alignment Limits," LCO 3.1.5, "Shutdown Bank Insertion Limits," LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," provide limits on control component operation and on monitored process variables, which ensure that the core operates within the fuel design criteria.

The shutdown and control bank insertion and alignment limits, AFD, and QPTR are process variables that together characterize and control the three dimensional power distribution of the reactor core. Additionally, the control bank insertion limits control the reactivity that could be added in the event of a rod ejection accident, and the shutdown and control bank insertion limits ensure the required SDM is maintained.

Operation within the shutdown and control bank insertion and alignment, AFD, and QPTR LCO limits will prevent fuel cladding failures that would breach the primary fission product barrier and release fission products to the reactor coolant in the event of a Loss Of Coolant Accident (LOCA), loss of flow, ejected rod, or other accident requiring termination by a Reactor Trip System (RTS) trip function.

BASES

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APPLICABLE  
SAFETY ANALYSIS

The shutdown and control bank insertion limits, AFD, and QPTR LCOs are required to prevent power distributions that could result in fuel cladding failures in the event of a LOCA, loss of flow, ejected rod, or other accident requiring termination by an RTS trip function.

The acceptance criteria for addressing shutdown and control bank insertion limits and inoperability or misalignment are that:

- a. There be no violations of:
  - 1. specified acceptable fuel design limits, or
  - 2. Reactor Coolant System pressure boundary integrity; and
- b. The core remains subcritical after accident transients.

As such, the shutdown and control bank insertion limits affect safety analysis involving core reactivity and power distributions (Ref. 3).

The SDM requirement is ensured by limiting the control and shutdown bank insertion limits so that allowable inserted worth of the RCCAs is such that sufficient reactivity is available in the rods to shut down the reactor to hot zero power with a reactivity margin that assumes the maximum worth RCCA remains fully withdrawn upon trip (Ref. 3).

Operation at the insertion limits or AFD limits may approach the maximum allowable linear heat generation rate or peaking factor with the allowed QPTR present. Operation at the insertion limit may also indicate the maximum ejected RCCA worth could be equal to the limiting value in fuel cycles that have sufficiently high ejected RCCA worths.

The control and shutdown bank insertion and alignment, AFD, and QPTR limits ensure that safety analyses assumptions for SDM, ejected rod worth, and power distribution peaking factors are preserved (Ref. 3).

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The control bank insertion, sequence, and overlap limits satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii), in that they are initial conditions assumed in the safety analysis.

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LCO

The limits on control bank insertion, sequence, and overlap, as defined in the COLR, must be maintained because they serve the function of preserving power distribution, ensuring that the SDM is maintained, ensuring that ejected rod worth is maintained, and ensuring adequate negative reactivity insertion is available on trip. The overlap between control banks provides more uniform rates of reactivity insertion and withdrawal and is imposed to maintain acceptable power peaking during control bank motion.

The LCO has been modified by a Note indicating that the LCO requirement is suspended during the performance of SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the control bank to move below the LCO limits, which would violate the LCO.

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APPLICABILITY

The control bank insertion, sequence, and overlap limits shall be maintained with the reactor in MODES 1 and 2 with  $k_{eff} \geq 1.0$ . These limits must be maintained, since they preserve the assumed power distribution, ejected rod worth, SDM, and reactivity rate insertion assumptions. Applicability in MODE 2 with  $k_{eff} < 1.0$  or MODES 3, 4, and 5 is not required, since neither the power distribution nor ejected rod worth assumptions would be exceeded in these MODES.

## BASES

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### ACTIONS

A.1.1, A.1.2, A.2, B.1.1, B.1.2, and B.2

When the control banks are outside the acceptable insertion limits, they must be restored to within those limits. This restoration can occur in two ways:

- a. Reducing power to be consistent with rod position; or
- b. Moving rods to be consistent with power.

Also, verification of SDM or initiation of boration to regain SDM is required within 1 hour, since the SDM in MODE 1 and MODE 2 with  $k_{eff} \geq 1.0$  normally ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") has been upset. If control banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

Similarly, if the control banks are found to be out of sequence or in the wrong overlap configuration, they must be restored to meet the limits.

Operation beyond the LCO limits is allowed for a short time period in order to take conservative action because the simultaneous occurrence of either a LOCA, loss of flow accident, ejected rod accident, or other accident during this short time period, together with an inadequate power distribution or reactivity capability, has an acceptably low probability.

The allowed Completion Time of 2 hours for restoring the banks to within the insertion, sequence, and overlap limits provides an acceptable time for evaluating and repairing minor problems without allowing the unit to remain in an unacceptable condition for an extended period of time.

BASES

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ACTIONS (continued)

C.1

If Required Actions A.1 and A.2, or B.1 and B.2 cannot be completed within the associated Completion Times, the unit must be brought to MODE 2 with  $k_{eff} < 1.0$ , where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.6.1

This Surveillance is required to ensure that the reactor does not achieve criticality with the control banks below their insertion limits.

The Estimated Critical Position (ECP) depends upon a number of factors, one of which is xenon concentration. If the ECP was calculated long before criticality, xenon concentration could change to make the ECP substantially in error. Conversely, determining the ECP immediately before criticality could be an unnecessary burden. There are a number of unit parameters requiring operator attention at that point. Performing the ECP calculation within 4 hours prior to criticality avoids a large error from changes in xenon concentration, but allows the operator some flexibility to schedule the ECP calculation with other startup activities.

SR 3.1.6.2

Verification of the control bank insertion limits at a Frequency of 12 hours is sufficient to detect control banks that may be approaching the insertion limits since, normally, very little rod motion occurs in 12 hours.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.6.3

When control banks are maintained within their insertion limits as checked by SR 3.1.6.2 above, it is unlikely that their sequence and overlap will not be in accordance with requirements provided in the COLR. A Frequency of 12 hours is consistent with the insertion limit check above in SR 3.1.6.2.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 10, GDC 26, GDC 28.
2. 10 CFR 50.46.
3. UFSAR, Chapter 15.

BASES

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## B 3.1 REACTIVITY CONTROL SYSTEM

### B 3.1.7 Rod Position Indication

#### BASES

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#### BACKGROUND

According to GDC 13 (Ref. 1), instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and accident conditions must be OPERABLE. LCO 3.1.7 is required to ensure OPERABILITY of the control rod position indicators to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits.

The OPERABILITY, including position indication, of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumptions of available SDM. Rod position indication is required to assess OPERABILITY and misalignment.

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. Control rod inoperability or misalignment may cause increased power peaking, due to the asymmetric reactivity distribution and a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on control rod alignment and OPERABILITY have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

BASES

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BACKGROUND (continued)

Rod Cluster Control Assemblies (RCCAs), or rods, are moved out of the core (up or withdrawn) or into the core (down or inserted) by their control rod drive mechanisms. The 53 RCCAs are divided among 4 control banks and 5 shutdown banks. A bank of RCCAs consists of either one group, or two groups that are moved in a staggered fashion to provide for precise reactivity control but which are always within one step of each other. Each of the control banks are divided into two groups, for a total of 25 control bank rods. Shutdown banks A and B are also divided into two groups, however, shutdown banks C, D, and E have only one group each, for a total of 28 shutdown bank rods. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously.

The axial position of shutdown rods and control rods is indicated by two separate and independent systems, the Bank Demand Position Indication System (commonly called group step counters) and the Digital Rod Position Indication (DRPI) System.

The Bank Demand Position Indication System counts the pulses from the Rod Control System that move the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise ( $\pm 1$  step or  $\pm \frac{1}{8}$  inch) but not very reliable because it is a demanded position indication, not an actual position indication. For example, if a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

BASES

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BACKGROUND (continued)

The DRPI System provides a highly accurate indication of actual control rod position, but at a lower precision than the step counters. The DRPI System determines the actual position of each control bank and shutdown bank rod by using individual coils that are mounted concentrically along the outside boundaries of the rod drive pressure housings. Each control bank rod has 42 coil assemblies evenly spaced along its length at 3.75 inch (6 step) intervals from rod bottom to the fully withdrawn position. Each shutdown bank rod has 20 coil assemblies evenly spaced along its length at 3.75 inch intervals from rod bottom to 18 steps and from 210 steps to the fully withdrawn position, with a transition LED representing shutdown bank rod position between 18 steps and the fully withdrawn position. The coils magnetically sense the presence or absence of a rod drive shaft and send this information to two Data Cabinets located in the containment building. To prevent total loss of position indication due to a single failure, the outputs of every other coil are connected as inputs to one Data Cabinet, while the outputs of the remaining coils are connected to the other Data Cabinet. This division of coils and their respective cabinets is referenced as Data A and Data B coils/cabinets, and allows detection of rod position within the required band of  $\pm 12$  steps even with a complete failure of a set of coils.

Normal system accuracy is  $\pm 4$  steps ( $\pm 3$  steps with an additional step added for coil placement and thermal expansion). If a data error occurs, the system is shifted to the "half accuracy" mode. As a rod is moved under "half accuracy" conditions, only every other LED will light (i.e., the LEDs associated with the operable data system) since the effective coil spacing is 7.5 inches (12 steps). Under "half accuracy" conditions with data A bad, the system accuracy is  $+ 10$  steps,  $- 4$  steps. Under "half accuracy" conditions with data B bad, the system accuracy is  $+ 4$  steps,  $- 10$  steps. Therefore, the normal indication accuracy of the DRPI System is  $\pm 4$  steps, and the maximum uncertainty is 10 steps. With an indicated deviation of 12 steps between the group step counter and DRPI, the maximum deviation between actual rod position and the demand position could be 22 steps.

BASES

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APPLICABLE  
SAFETY ANALYSES

Control and shutdown rod position accuracy is essential during power operation. Power peaking, ejected rod worth, or SDM limits may be violated in the event of a Design Basis Accident (Ref. 2), with control or shutdown rods operating outside their limits undetected. Therefore, the acceptance criteria for rod position indication is that rod positions must be known with sufficient accuracy in order to verify the core is operating within the group sequence, overlap, design peaking, ejected rod worth, and with minimum SDM limits (LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits"). The rod positions must also be known in order to verify the alignment limits are preserved (LCO 3.1.4, "Rod Group Alignment Limits"). Control rod positions are continuously monitored to provide operators with information that ensures the plant is operating within the bounds of the accident analysis assumptions.

The control rod position indicator channels satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii). The control rod position indicators monitor control rod position, which is an initial condition of the accident.

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LCO

LCO 3.1.7 specifies that the DRPI System and the Bank Demand Position Indication System be OPERABLE for each control rod. For the control rod position indicators to be OPERABLE the following requirements must be met:

- a. The DRPI System indicates within 12 steps of the group step counter demand position as required by LCO 3.1.4, "Rod Group Alignment Limits;"
  - b. The DRPI System has no failed coils; and
  - c. The Bank Demand Indication System has been calibrated either in the fully inserted position or to the DRPI System.
-

BASES

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LCO (continued)

The 12 step agreement limit between the Bank Demand Position Indication System and the DRPI System indicates that the Bank Demand Position Indication System is adequately calibrated, and can be used for indication of the measurement of control rod bank position.

A deviation of less than the allowable limit, given in LCO 3.1.4, in position indication for a single control rod, ensures high confidence that the position uncertainty of the corresponding control rod group is within the assumed values used in the analysis (that specified control rod group insertion limits).

These requirements ensure that control rod position indication during power operation and PHYSICS TESTS is accurate, and that design assumptions are not challenged.

OPERABILITY of the position indicator channels ensures that inoperable, misaligned, or mispositioned control rods can be detected. Therefore, power peaking, ejected rod worth, and SDM can be controlled within acceptable limits.

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APPLICABILITY

The requirements on the DRPI and step counters are only applicable in MODES 1 and 2 (consistent with LCO 3.1.4, LCO 3.1.5, and LCO 3.1.6), because these are the only MODES in which power is generated, and the OPERABILITY and alignment of rods have the potential to affect the safety of the plant. In the shutdown MODES, the OPERABILITY of the shutdown and control banks has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the Reactor Coolant System.

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ACTIONS

The ACTIONS table is modified by a Note indicating that a separate Condition entry is allowed for each inoperable DRPI and each demand position indicator. This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each inoperable position indicator.

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BASES

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ACTIONS (continued)

A.1

When one DRPI channel per group fails, the position of the rod can still be determined by use of the movable incore detectors. Based on experience, normal power operation does not require excessive movement of banks. If a bank has been significantly moved, the Required Action of B.1 or B.2 below is required. Therefore, verification of RCCA position within the Completion Time of 8 hours is adequate for allowing continued full power operation, since the probability of simultaneously having a rod significantly out of position and an event sensitive to that rod position is small.

A.2

Reduction of THERMAL POWER to  $\leq 50\%$  RTP puts the core into a condition where rod position will not cause core peaking factors to approach the core peaking factor limits.

The allowed Completion Time of 8 hours is reasonable, based on operating experience, for reducing power to  $\leq 50\%$  RTP from full power conditions without challenging plant systems and allowing for rod position determination by Required Action A.1 above.

B.1 and B.2

These Required Actions clarify that when one or more rods with inoperable DRPIs have been moved in excess of 24 steps in one direction, since the position was last determined, the Required Actions of A.1 and A.2 are still appropriate but must be initiated promptly under Required Action B.1 to begin verifying that these rods are still properly positioned, relative to their group positions.

If immediate actions have not been initiated to verify the rod's position, THERMAL POWER must be reduced to  $\leq 50\%$  RTP within 8 hours to avoid undesirable power distributions that could result from continued operation at  $> 50\%$  RTP, if one or more rods are misaligned by more than 24 steps.



BASES

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ACTIONS (continued)

C.1.1 and C.1.2

With one demand position indicator per bank inoperable, the rod positions can be determined by the DRPI System. Since normal power operation does not require excessive movement of rods, verification by administrative means that the DRPIs for the affected banks are OPERABLE and the most withdrawn rod and the least withdrawn rod of the affected banks are  $\leq 12$  steps apart within the allowed Completion Time of once every 8 hours is adequate. This verification can be an examination of logs, administrative controls, or other information that shows that all DRPIs in the affected bank are OPERABLE.

C.2

Reduction of THERMAL POWER to  $\leq 50\%$  RTP puts the core into a condition where rod position will not cause core peaking to approach the core peaking factor limits. The allowed Completion Time of 8 hours provides an acceptable period of time to verify the rod positions per Required Actions C.1.1 and C.1.2 or reduce power to  $\leq 50\%$  RTP.

D.1

If the Required Actions cannot be completed within the associated Completion Time, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. The allowed Completion Time is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.7.1

Verification that the DRPI agrees with the demand position within 12 steps ensures that the DRPI is operating correctly. Since the DRPI does not display the actual shutdown rod positions between 18 and 210 steps, only points within the indicated ranges are required in comparison.

This surveillance is performed prior to reactor criticality after each removal of the reactor head, since there is potential for unnecessary plant transients if the SR were performed with the reactor at power.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 13.
2. UFSAR, Chapter 15.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.8 PHYSICS TESTS Exceptions - MODE 2

BASES

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BACKGROUND

The primary purpose of the MODE 2 PHYSICS TESTS exceptions is to permit relaxations of existing LCOs to allow certain PHYSICS TESTS to be performed.

SECTION XI of 10 CFR 50, Appendix B (Ref. 1), requires that a test program be established to ensure that structures, systems, and components will perform satisfactorily in service. All functions necessary to ensure that the specified design conditions are not exceeded during normal operation and anticipated operational occurrences must be tested. This testing is an integral part of the design, construction, and operation of the unit. Requirements for notification of the NRC, for the purpose of conducting tests and experiments, are specified in 10 CFR 50.59 (Ref. 2).

The key objectives of a test program are to (Ref. 3):

- a. Ensure that the facility has been adequately designed;
- b. Validate the analytical models used in the design and analysis;
- c. Verify the assumptions used to predict unit response;
- d. Ensure that installation of equipment in the facility has been accomplished in accordance with the design; and
- e. Verify that the operating and emergency procedures are adequate.

To accomplish these objectives, testing is performed prior to initial criticality, during startup, during low power operations, during power ascension, at high power, and after each refueling. The PHYSICS TESTS requirements for reload fuel cycles ensure that the operating characteristics of the core are consistent with the design predictions and that the core can be operated as designed.

BASES

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BACKGROUND (continued)

PHYSICS TESTS procedures are written and approved in accordance with established formats. The procedures include all information necessary to permit a detailed execution of the testing required to ensure that the design intent is met. PHYSICS TESTS are performed in accordance with these procedures and test results are approved prior to continued power escalation and long term power operation.

The PHYSICS TESTS for reload fuel cycles in MODE 2 may include:

- a. Critical Boron Concentration - Control Rods Withdrawn;
- b. Critical Boron Concentration - Reference Bank Inserted;
- c. Control Rod Worth; and
- d. Isothermal Temperature Coefficient (ITC).

These and other supplementary tests may be required to calibrate the nuclear instrumentation or to diagnose operational problems. These tests may cause the operating controls and process variables to deviate from their LCO requirements during their performance.

- a. The Critical Boron Concentration - Control Rods Withdrawn Test measures the critical boron concentration at Hot Zero Power (HZP). With all rods out, the reference bank is at or near its fully withdrawn position. HZP is where the core is critical ( $k_{eff} = 1.0$ ), and the Reactor Coolant System (RCS) is at design temperature and pressure for zero power. Performance of this test could violate LCO 3.1.3, "Moderator Temperature Coefficient (MTC)."

BASES

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BACKGROUND (continued)

- b. The Critical Boron Concentration - Reference Bank Inserted Test measures the critical boron concentration at HZP, with a bank having the highest reactivity worth of approximately 1%  $\Delta k/k$  when fully inserted into the core. This test is used to measure the differential boron worth. With the core at HZP and all banks fully withdrawn, the boron concentration of the reactor coolant is gradually lowered in a continuous manner. The reference bank is then inserted to make up for the decreasing boron concentration until the reference bank has been moved over its entire range of travel. The reactivity resulting from each incremental bank movement is measured with a reactivity computer. The difference between the measured critical boron concentration with all rods fully withdrawn and with the bank inserted is determined. The differential boron worth is determined by dividing the measured bank worth by the measured boron concentration difference. Performance of this test could violate LCO 3.1.4, "Rod Group Alignment Limits"; LCO 3.1.5, "Shutdown Bank Insertion Limits"; or LCO 3.1.6, "Control Bank Insertion Limits."

BASES

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BACKGROUND (continued)

- c. The Control Rod Worth Test is used to measure the reactivity worth of selected control and shutdown banks. This test is performed at HZP and has four alternative methods of performance. The first method, the Boron Exchange Method, varies the reactor coolant boron concentration and moves the selected bank in response to the changing boron concentration. The reactivity changes are measured with a reactivity computer. This sequence is repeated for the remaining banks. The second method, the Rod Swap Method, measures the worth of a predetermined reference bank using the Boron Exchange Method above. The reference bank is then nearly fully inserted into the core. The selected bank is then inserted into the core as the reference bank is withdrawn. The HZP critical conditions are then determined with the selected bank fully inserted into the core. The worth of the selected bank is inferred, based on the position of the reference bank with respect to the selected bank. This sequence is repeated as necessary for the remaining banks. The third method, the Boron Endpoint Method, moves the selected bank over its entire length of travel and then varies the reactor coolant boron concentration to achieve HZP criticality again. The difference in boron concentration is the worth of the selected bank. This sequence is repeated for the remaining banks. The fourth method, the Dynamic Rod Worth Method, moves the selected bank over its entire length of travel in one continuous motion and measures its worth dynamically with a specialized reactivity computer. After the bank is subsequently withdrawn reestablishing HZP criticality, this sequence is repeated for the remaining banks. Performance of this test violates LCO 3.1.4, LCO 3.1.5, and LCO 3.1.6.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

- d. The ITC Test measures the ITC of the reactor. This test is performed at HZP and has two methods of performance. The first method, the Slope Method, varies RCS temperature in a slow and continuous manner. The reactivity change is measured with a reactivity computer as a function of the temperature change. The ITC is the slope of the reactivity versus the temperature plot. The test is repeated by reversing the direction of the temperature change, and the final ITC is the average of the two calculated ITCs. The second method, the Endpoint Method, changes the RCS temperature and measures the reactivity at the beginning and end of the temperature change. The ITC is the total reactivity change divided by the total temperature change. The test is repeated by reversing the direction of the temperature change, and the final ITC is the average of the two calculated ITCs. The Moderator Temperature Coefficient (MTC) at Beginning Of Life (BOL) is determined from the measured ITC. This test satisfies the requirement of SR 3.1.3.1. Performance of this test could violate LCO 3.4.2, "RCS Minimum Temperature for Criticality."

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APPLICABLE  
SAFETY ANALYSES

The fuel is protected by multiple LCOs that preserve the initial conditions of the core assumed in the safety analyses. The methods for development of the LCOs that are excepted by this LCO are described in the Westinghouse Reload Safety Evaluation Methodology Report (Ref. 5). The above mentioned PHYSICS TESTS, and other tests that may be required to calibrate nuclear instrumentation or to diagnose operational problems, may require the operating control or process variables to deviate from their LCO limitations.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The UFSAR (Ref. 6) defines requirements for initial testing of the facility, including PHYSICS TESTS. Reference 6 summarizes the zero, low power, and power tests. Reload fuel cycle PHYSICS TESTS are outlined in ANSI/ANS-19.6.1-1985 (Ref. 4). Although these PHYSICS TESTS are generally accomplished within the limits of all LCOs, conditions may occur when one or more LCOs must be suspended to make completion of PHYSICS TESTS possible or practical. This is acceptable as long as the fuel design criteria are not violated. When one or more of the requirements specified in LCO 3.1.3, "Moderator Temperature Coefficient (MTC)," LCO 3.1.4, "Rod Group Alignment Limits," LCO 3.1.5, "Shutdown Bank Insertion Limits," LCO 3.1.6, "Control Bank Insertion Limits," and LCO 3.4.2, "RCS Minimum Temperature for Criticality" are suspended for PHYSICS TESTS, the fuel design criteria are preserved as long as the power level is limited to  $\leq 5\%$  RTP, the reactor coolant temperature is kept  $\geq 530^{\circ}\text{F}$ , and SDM is within the limits specified in the COLR.

The PHYSICS TESTS include measurement of core nuclear parameters or the exercise of control components that affect process variables. Among the process variables involved are AFD and QPTR, which represent initial conditions of the unit safety analyses. Also involved are the movable control components (control and shutdown rods), which are required to shut down the reactor. The limits for these variables are specified for each fuel cycle in the COLR. PHYSICS TESTS meet the criteria for inclusion in the Technical Specifications, since the components and process variable LCOs suspended during PHYSICS TESTS meet Criteria 1, 2, and 3 of 10 CFR 50.36(c)(2)(ii).



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BASES

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LCO                      This LCO allows the reactor parameters of MTC and minimum temperature for criticality to be outside their specified limits. In addition, it allows selected control and shutdown rods to be positioned outside of their specified alignment and insertion limits. Operation beyond specified limits is permitted for the purpose of performing PHYSICS TESTS and poses no threat to fuel integrity, provided the SRs are met.

The requirements of LCO 3.1.3, LCO 3.1.4, LCO 3.1.5, LCO 3.1.6, and LCO 3.4.2 may be suspended during the performance of PHYSICS TESTS provided:

- a.    RCS lowest loop average temperature is  $\geq 530$  °F;
- b.    SDM is within the limits specified in the COLR; and
- c.    THERMAL POWER is maintained  $\leq 5\%$  RTP.

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APPLICABILITY        This LCO is applicable in MODE 2 when performing low power PHYSICS TESTS. The applicable PHYSICS TESTS are performed in MODE 2 at HZP.

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ACTIONS                A.1 and A.2

If the SDM requirement is not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. The operator should begin boration with the best source available for the unit conditions. Boration will be continued until SDM is within limit.

Suspension of PHYSICS TESTS exceptions requires restoration of each of the applicable LCOs to within specification within 1 hour.

BASES

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ACTIONS (continued)

B.1

When THERMAL POWER is > 5% RTP, the only acceptable action is to open the Reactor Trip Breakers (RTBs) to prevent operation of the reactor beyond its design limits. Immediately opening the RTBs will shut down the reactor and prevent operation of the reactor outside of its design limits.

C.1

When the RCS lowest  $T_{avg}$  is < 530°F, the appropriate action is to restore  $T_{avg}$  to within its specified limit. The allowed Completion Time of 15 minutes provides time for restoring  $T_{avg}$  to within limits without allowing the unit to remain in an unacceptable condition for an extended period of time. Operation with the reactor critical and with temperature below 530°F could violate the assumptions for accidents analyzed in the safety analyses.

D.1

If Required Action C.1 cannot be completed within the associated Completion Time, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within an additional 15 minutes. The Completion Time of 15 additional minutes is reasonable, based on operating experience, for reaching MODE 3 in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.1.8.1

The power range and intermediate range neutron detectors must be verified to be OPERABLE in MODE 2 by LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation." A CHANNEL OPERATIONAL TEST is performed on each power range and intermediate range channel prior to initiation of the PHYSICS TESTS. This will ensure that the RTS is properly aligned to provide the required degree of core protection during the performance of the PHYSICS TESTS.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.8.2

Verification that the RCS lowest loop  $T_{avg}$  is  $\geq 530^{\circ}\text{F}$  will ensure that the unit is not operating in a condition that could invalidate the safety analyses. Verification of the RCS temperature at a Frequency of 30 minutes during the performance of the PHYSICS TESTS will ensure that the initial conditions of the safety analyses are not violated.

SR 3.1.8.3

Verification that the THERMAL POWER is  $\leq 5\%$  RTP will ensure that the unit is not operating in a condition that could invalidate the safety analyses. Verification of the THERMAL POWER at a Frequency of 1 hour during the performance of the PHYSICS TESTS will ensure that the initial conditions of the safety analyses are not violated.

SR 3.1.8.4

The SDM is verified by performing a reactivity balance calculation, considering the following reactivity effects:

- a. RCS boron concentration;
- b. Control bank position;
- c. RCS average temperature;
- d. Fuel burnup based on gross thermal energy generation;
- e. Xenon concentration;
- f. Samarium concentration; and
- g. Isothermal temperature coefficient (ITC).

Using the ITC accounts for Doppler reactivity in this calculation because the reactor is subcritical, and the fuel temperature will be changing at the same rate as the RCS.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Frequency of 24 hours is based on the generally slow change in required boron concentration and on the low probability of an accident occurring without the required SDM. This allows time for the operator to collect the required data, which includes performing a boron concentration analysis and completing the calculation.

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REFERENCES

1. 10 CFR 50, Appendix B, SECTION XI.
2. 10 CFR 50.59.
3. Regulatory Guide 1.68, Revision 2, August, 1978.
4. ANSI/ANS-19.6.1-1985, December 13, 1985.
5. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology Report," July 1985.
6. UFSAR Section 14.2.

## B 3.2 POWER DISTRIBUTION LIMITS

### B 3.2.1 Heat Flux Hot Channel Factor ( $F_0(Z)$ )

#### BASES

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#### BACKGROUND

The purpose of the limits on the values of  $F_0(Z)$  is to limit the local (i.e., pellet) peak power density. The value of  $F_0(Z)$  varies along the axial height ( $Z$ ) of the core.

$F_0(Z)$  is defined as the maximum local fuel rod linear power density divided by the average fuel rod linear power density, assuming nominal fuel pellet and fuel rod dimensions. Therefore,  $F_0(Z)$  is a measure of the peak fuel pellet power within the reactor core.

During power operation, the global power distribution is limited by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," which are directly and continuously measured process variables. These LCOs, along with LCO 3.1.6, "Control Bank Insertion Limits," maintain the core within power distribution limits on a continuous basis.

$F_0(Z)$  varies with fuel loading patterns, control bank insertion, fuel burnup, and changes in axial power distribution.

$F_0(Z)$  is measured periodically using the incore detector system. These measurements are generally taken with the core at or near equilibrium conditions.

Using the measured three dimensional power distributions, it is possible to derive a measured value for  $F_0(Z)$ . However, because this value represents an equilibrium condition, it does not include the variations in the value of  $F_0(Z)$  which are present during nonequilibrium situations, such as load following or power ascension.

To account for these possible variations, the equilibrium value of  $F_0(Z)$  is adjusted as  $F_0^N(Z)$  by an elevation dependent factor that accounts for the calculated worst case transient conditions.

BASES

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BACKGROUND (continued)

Core monitoring and control under non-equilibrium conditions are accomplished by operating the core within the limits of the appropriate LCOs, including the limits on AFD, QPTR, and control rod insertion.

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APPLICABLE  
SAFETY ANALYSES

This LCO precludes core power distributions that violate the following fuel design criteria:

- a. During a large break Loss Of Coolant Accident (LOCA), the peak cladding temperature must not exceed 2200°F (Ref. 1);
- b. During a loss of forced reactor coolant flow accident, there must be at least 95% probability at the 95% confidence level (the 95/95 Departure from Nucleate Boiling (DNB) criterion) that the hot fuel rod in the core does not experience a DNB condition;
- c. During an ejected rod accident, the prompt energy deposition to the fuel must not exceed 200 cal/gm (Ref. 2); and
- d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn (Ref. 3).

Limits on  $F_0(Z)$  ensure that the value of the initial total peaking factor assumed in the accident analyses remains valid. Other criteria must also be met (e.g., maximum cladding oxidation, maximum hydrogen generation, coolable geometry, and long term cooling). However, the peak cladding temperature is typically most limiting.

$F_0(Z)$  limits assumed in the LOCA analysis are typically limiting relative to (i.e., lower than) the  $F_0(Z)$  limit assumed in safety analyses for other postulated accidents. Therefore, this LCO provides conservative limits for other postulated accidents.

$F_0(Z)$  satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES

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LCO

The Heat Flux Hot Channel Factor,  $F_0(Z)$ , shall be limited by the following relationships:

$$F_0(Z) \leq \frac{F_0^{RTP}}{P} K(Z) \quad \text{for } P > 0.5$$

$$F_0(Z) \leq \frac{F_0^{RTP}}{0.5} K(Z) \quad \text{for } P \leq 0.5$$

where:  $F_0^{RTP}$  is the  $F_0(Z)$  limit at RTP provided in the COLR.

$K(Z)$  is the normalized  $F_0(Z)$  as a function of core height provided in the COLR, and

$$P = \frac{\text{THERMAL POWER}}{\text{RTP}}$$

For this facility, the actual values of  $F_0^{RTP}$  and  $K(Z)$  are given in the COLR; however,  $F_0^{RTP}$  is normally a number on the order of 2.50, and  $K(Z)$  is a function that looks like the one provided in Figure B 3.2.1-1.

$F_0(Z)$  is approximated by  $F_0^C(Z)$  and  $F_0^M(Z)$ . Thus, both  $F_0^C(Z)$  and  $F_0^M(Z)$  must meet the preceding limits on  $F_0(Z)$ .

An  $F_0^C(Z)$  evaluation requires obtaining an incore flux map in MODE 1. From the incore flux map results we obtain the measured value ( $F_0^M(Z)$ ) of  $F_0(Z)$ . Then,

$$F_0^C(Z) = F_0^M(Z) * (1.0815)$$

where 1.0815 is a factor that accounts for fuel manufacturing tolerances and flux map measurement uncertainty.

$F_0^C(Z)$  is an excellent approximation for  $F_0(Z)$  when the reactor is at the steady state power at which the incore flux map was taken.

## BASES

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### LCO (continued)

The expression for  $F_0^W(Z)$  is:

$$F_0^W(Z) = F_0^C(Z) W(Z)$$

where  $W(Z)$  is a cycle dependent function that accounts for power distribution transients encountered during normal operation.  $W(Z)$  is included in the COLR. The  $F_0^C(Z)$  is calculated at equilibrium conditions.

The  $F_0(Z)$  limits define limiting values for core power peaking that precludes peak cladding temperatures above 2200°F during either a large or small break LOCA.

This LCO requires operation within the bounds assumed in the safety analyses. Calculations are performed in the core design process to confirm that the core can be controlled in such a manner during operation that it can stay within the LOCA  $F_0(Z)$  limits. If  $F_0^C(Z)$  cannot be maintained within the LCO limits, reduction of the core power is required.

Violating the LCO limits for  $F_0(Z)$  may produce unacceptable consequences if a design basis event occurs while  $F_0(Z)$  is outside its specified limits.

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### APPLICABILITY

The  $F_0(Z)$  limits must be maintained in MODE 1 to prevent core power distributions from exceeding the limits assumed in the safety analyses. Applicability in other MODES is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power.



BASES

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ACTIONS

A.1, A.2, A.3, and A.4

Reducing THERMAL POWER by  $\geq 1\%$  RTP for each  $1\%$  by which  $F_0^C(Z)$  exceeds its limit, maintains an acceptable absolute power density. The Completion Time of 15 minutes provides an acceptable time to reduce power in an orderly manner and without allowing the unit to remain in an unacceptable condition for an extended period of time.

A reduction of the Power Range Neutron Flux-High trip setpoints by  $\geq 1\%$  for each  $1\%$  by which  $F_0^C(Z)$  exceeds its limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this time period and the preceding prompt reduction in THERMAL POWER in accordance with Required Action A.1.

Reduction in the Overpower  $\Delta T$  trip setpoints (value of  $K_4$ ) by  $\geq 1\%$  for each  $1\%$  by which  $F_0^C(Z)$  exceeds its limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this time period, and the preceding prompt reduction in THERMAL POWER in accordance with Required Action A.1.

Verification that  $F_0^C(Z)$  has been restored to within its limit, by performing SR 3.2.1.1 and SR 3.2.1.2 prior to increasing THERMAL POWER above the limit imposed by Required Action A.1, ensures that core conditions during operation at higher power levels and future operation are consistent with safety analyses assumptions.

## BASES

### ACTIONS (continued)

#### B.1

If it is found that the maximum calculated value of  $F_0(Z)$  that can occur during normal maneuvers,  $F_0^W(Z)$ , exceeds its specified limits, there exists a potential for  $F_0^W(Z)$  to become excessively high if a normal operational transient occurs. Reducing THERMAL POWER by  $\geq 1\%$  RTP for each  $1\%$  by which  $F_0^W(Z)$  exceeds its limit within the allowed Completion Time of 4 hours, maintains an acceptable absolute power density such that even if a transient occurred, core peaking factors are not exceeded.

#### B.2

A reduction of the Power Range Neutron Flux-High trip setpoints by  $\geq 1\%$  for each  $1\%$  by which  $F_0^W(Z)$  exceeds the limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this period and the preceding prompt reduction in THERMAL POWER in accordance with Required Action B.1.

#### B.3

Reduction in the Overpower  $\Delta T$  trip setpoints (value of  $K_4$ ) by  $\geq 1\%$  for each  $1\%$  by which  $F_0^W(Z)$  exceeds the limit, is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this period and the preceding prompt reduction in THERMAL POWER in accordance with Required Action B.1.

#### B.4

Verification that  $F_0^W(Z)$  has been restored to within limit, by performing SR 3.2.1.1 and SR 3.2.1.2 prior to increasing THERMAL POWER above the limit imposed by Required Action B.1, ensures that core conditions during operation at higher power levels and future operation are consistent with safety analyses assumptions.

## BASES

### ACTIONS (continued)

#### C.1

If the Required Actions of A.1 through A.4, or B.1 through B.4, are not met within their associated Completion Times, the unit must be placed in a mode or condition in which the LCO requirements are not applicable. This is done by placing the unit in at least MODE 2 within 6 hours. The allowed Completion Time is reasonable based on operating experience regarding the amount of time it takes to reach MODE 2 from full power operation in an orderly manner and without challenging plant systems.

### SURVEILLANCE REQUIREMENTS

SR 3.2.1.1 and SR 3.2.1.2 are modified by a Note. The Note applies during the first power ascension after a refueling. It states that THERMAL POWER may be increased until an equilibrium power level has been achieved at which a meaningful power distribution map can be obtained. These SRs are normally performed at > 40% RTP to provide core conditions as much like the full power conditions as possible (Ref. 4). This allowance is modified, however, by one of the Frequency conditions that requires verification that  $F_0^C(Z)$  and  $F_0^W(Z)$  are within their specified limits after a power rise of more than 10% RTP (and establishing equilibrium conditions) over the THERMAL POWER at which they were last verified to be within specified limits. Because  $F_0^C(Z)$  and  $F_0^W(Z)$  could not have previously been measured in this reload core, there is a second Frequency condition, applicable only for reload cores, that requires determination of these parameters before exceeding 75% RTP. This ensures that some determination of  $F_0^C(Z)$  and  $F_0^W(Z)$  are made at a lower power level at which adequate margin is available before going to 100% RTP. Also, this Frequency condition, together with the Frequency condition requiring verification of  $F_0^C(Z)$  and  $F_0^W(Z)$  following a power increase of more than 10%, ensures that  $F_0(Z)$  is verified as soon as RTP (or any other level for extended operation) is achieved. In the absence of these Frequency conditions, it is possible to increase power to RTP and operate for 31 days without verification of  $F_0^C(Z)$  and  $F_0^W(Z)$ . The Frequency condition is not intended to require verification of these parameters after every 10% increase in power level above the last verification. It only requires verification after a power level is achieved for extended operation that is 10% higher than that power at which  $F_0(Z)$  was last measured.

## BASES

### SURVEILLANCE REQUIREMENTS (continued)

#### SR 3.2.1.1

Verification that  $F_0^C(Z)$  is within its specified limits involves increasing  $F_0^M(Z)$  to allow for manufacturing tolerance and measurement uncertainties in order to obtain  $F_0^C(Z)$ . Specifically,  $F_0^M(Z)$  is the measured value of  $F_0(Z)$  obtained from incore flux map results and  $F_0^C(Z) = F_0^M(Z) * (1.0815)$  (Ref. 5).  $F_0^C(Z)$  is then compared to its specified limits.

The limit with which  $F_0^C(Z)$  is compared varies inversely with power above 50% RTP and directly with a function called  $K(Z)$  provided in the COLR.

Performing this Surveillance in MODE 1 prior to exceeding 75% RTP ensures that the  $F_0^C(Z)$  limit is met when RTP is achieved, because peaking factors generally decrease as power level is increased.

If THERMAL POWER has been increased by  $\geq 10\%$  RTP since the last determination of  $F_0^C(Z)$ , another evaluation of this factor is required 12 hours after achieving equilibrium conditions at this higher power level (to ensure that  $F_0^C(Z)$  values are being reduced sufficiently with power increase to stay within the LCO limits).

The top and bottom 15% of the core are excluded from the evaluation because of the low probability that these regions would be more limiting in the safety analysis and because of the difficulty of making a precise measurement in these regions.

The Frequency of 31 Effective Full Power Days (EFPD) is adequate to monitor the change of power distribution with core burnup because such changes are slow and well controlled when the unit is operated in accordance with the Technical Specifications (TS).

## BASES

### SURVEILLANCE REQUIREMENTS (continued)

#### SR 3.2.1.2

The nuclear design process includes calculations performed to determine that the core can be operated within the  $F_0(Z)$  limits. Because flux maps are taken in steady state conditions, the variations in power distribution resulting from normal operational maneuvers are not present in the flux map data. These variations are, however, conservatively calculated by considering a wide range of unit maneuvers in normal operation. The maximum peaking factor increase over steady state values, calculated as a function of core elevation,  $Z$ , is called  $W(Z)$ . Multiplying the measured total peaking factor,  $F_0^C(Z)$ , by  $W(Z)$  gives the maximum  $F_0(Z)$  calculated to occur in normal operation,  $F_0^M(Z)$ .

The limit with which  $F_0^M(Z)$  is compared varies inversely with power above 50% RTP and directly with the function  $K(Z)$  provided in the COLR.

The  $W(Z)$  curve is provided in the COLR for discrete core elevations. Flux map data are typically taken for 61 core elevations.  $F_0^C(Z)$  evaluations are not applicable for the following axial core regions, measured in percent of core height:

- a. Lower core region, from 0 to 15% inclusive; and
- b. Upper core region, from 85 to 100% inclusive.

The top and bottom 15% of the core are excluded from the evaluation because of the low probability that these regions would be more limiting in the safety analyses and because of the difficulty of making a precise measurement in these regions.

This Surveillance has been modified by a Note that may require that more frequent surveillances be performed. If  $F_0^M(Z)$  is evaluated, an evaluation of the expression below is required to account for any increase to  $F_0^M(Z)$  that may occur and cause the  $F_0(Z)$  limit to be exceeded before the next required  $F_0(Z)$  evaluation.

## BASES

### SURVEILLANCE REQUIREMENTS (continued)

If the two most recent  $F_0(Z)$  evaluations show an increase in the expression

$$\text{maximum over } z \quad \left[ \frac{F_0^C(Z)}{K(Z)} \right]$$

it is required to meet the  $F_0(Z)$  limit with the last  $F_0^W(Z)$  increased by the greater of the factor of 1.02 or by an appropriate factor specified in the COLR (Ref. 6), or to evaluate  $F_0(Z)$  more frequently, each 7 EFPD. These alternative requirements prevent  $F_0(Z)$  from exceeding its limit for any significant period of time without detection.

Performing the Surveillance in MODE 1 prior to exceeding 75% RTP ensures that the  $F_0(Z)$  limit is met when RTP is achieved, because peaking factors are generally decreased as power level is increased.

$F_0(Z)$  is verified at power levels  $\geq 10\%$  RTP above the THERMAL POWER of its last verification, 12 hours after achieving equilibrium conditions to ensure that  $F_0(Z)$  is within its limit at higher power levels.

The Surveillance Frequency of 31 EFPD is adequate to monitor the change of power distribution with core burnup. The Surveillance may be done more frequently if required by the results of  $F_0(Z)$  evaluations.

The Frequency of 31 EFPD is adequate to monitor the change of power distribution because such a change is sufficiently slow, when the unit is operated in accordance with the TS, to preclude adverse peaking factors between 31 day surveillances.

BASES

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REFERENCES

1. 10 CFR 50.46.
2. UFSAR, Section 15.4.8.
3. 10 CFR 50, Appendix A, GDC 26.
4. ANSI/ANS-19.6.1-1985, "Reload Startup Physics Test for Pressurized Water Reactors," December 13, 1985.
5. WCAP-7308-L-P-A, "Evaluation of Nuclear Hot Channel Factor Uncertainties," June 1988.
6. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control (and)  $F_0$  Surveillance Technical Specification," February 1994.

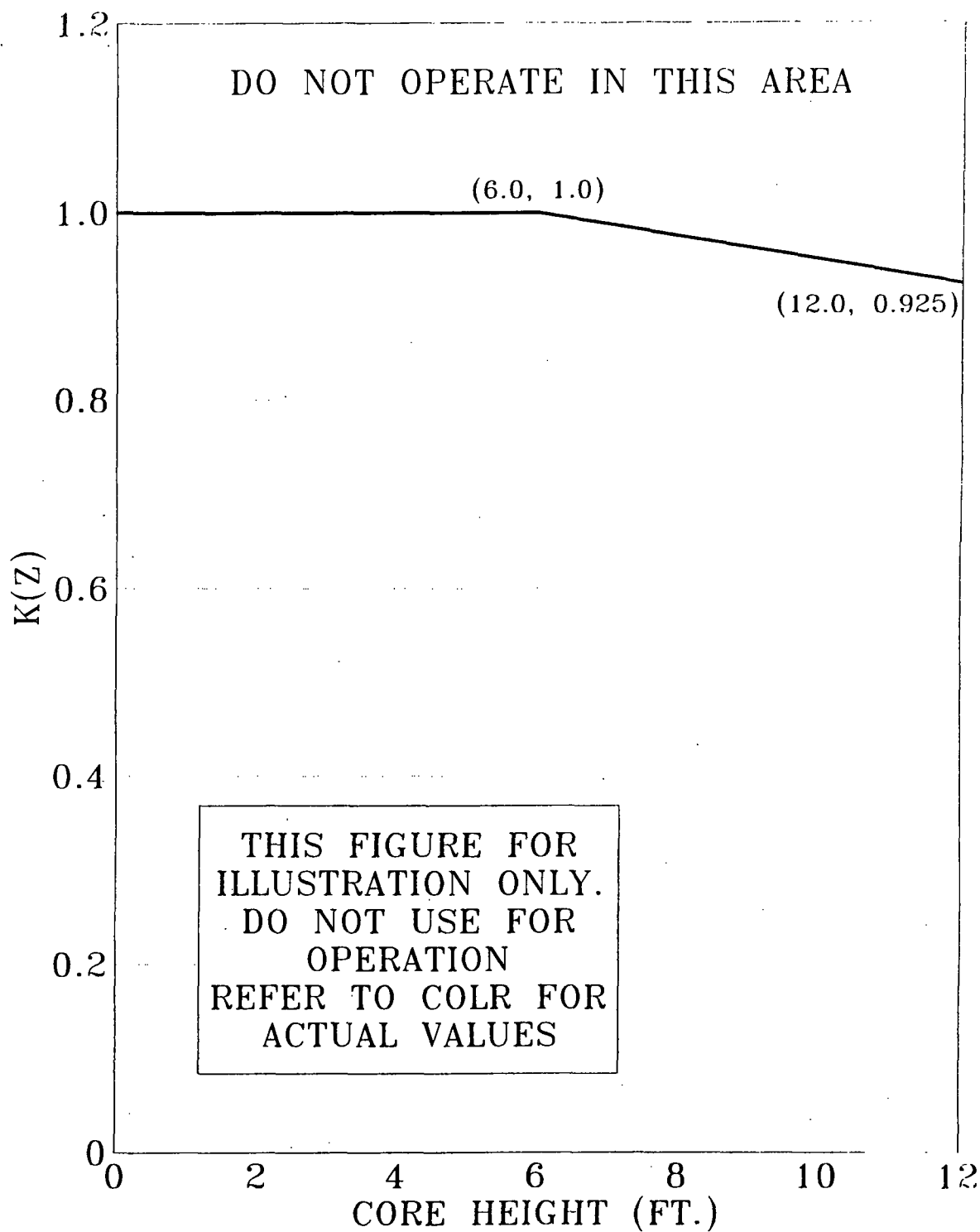


Figure B 3.2.1-1 (page 1 of 1)  
 $K(Z)$  - Normalized  $F_0(Z)$  as a function of Core Height



## B 3.2 POWER DISTRIBUTION LIMITS

### B 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ )

#### BASES

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#### BACKGROUND

The purpose of this LCO is to establish limits on the power density at any point in the core so that the fuel design criteria are not exceeded and the accident analysis assumptions remain valid. The design limits on local (pellet) and integrated fuel rod peak power density are expressed in terms of hot channel factors. Control of the core power distribution with respect to these factors ensures that local conditions in the fuel rods and coolant channels do not challenge core integrity at any location in the core during either normal operation or a postulated accident analyzed in the safety analyses.

$F_{\Delta H}^N$  is defined as the ratio of the integral of the linear power along the fuel rod with the highest integrated power to the average integrated fuel rod power. Therefore,  $F_{\Delta H}^N$  is a measure of the maximum total power produced in a fuel rod.

$F_{\Delta H}^N$  is sensitive to fuel loading patterns, control bank insertion, and fuel burnup.  $F_{\Delta H}^N$  typically increases with control bank insertion and typically decreases with fuel burnup.

$F_{\Delta H}^N$  is not directly measurable but is inferred from a power distribution map obtained with the movable incore detector system. Specifically, the results of the three dimensional power distribution map are analyzed by a computer to determine  $F_{\Delta H}^N$ . This factor is calculated at least every 31 Effective Full Power Days (EFPD). However, during power operation, the global power distribution is monitored by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," which address directly and continuously measured process variables.

The COLR provides peaking factor limits that ensure that the design criterion for the Departure from Nucleate Boiling (DNB) is met for normal operation, operational transients, and any transient condition arising from events of moderate frequency. All DNB limited transient events are assumed to begin with an  $F_{\Delta H}^N$  value that satisfies the LCO requirements.

## BASES

### BACKGROUND (continued)

Operation outside the LCO limits may produce unacceptable consequences if a DNB limiting event occurs. The DNB design basis ensures that there is no overheating of the fuel that results in possible cladding perforation with the release of fission products to the reactor coolant.

#### APPLICABLE SAFETY ANALYSES

Limits on  $F_{\Delta H}^N$  preclude core power distributions that exceed the following fuel design limits:

- a. There must be at least 95% probability at the 95% confidence level (the 95/95 DNB criterion) that the hottest fuel rod in the core does not experience a DNB condition;
- b. During a large break Loss Of Coolant Accident (LOCA), Peak Cladding Temperature (PCT) must not exceed 2200°F;
- c. During an ejected rod accident, the prompt energy deposition to the fuel must not exceed 200 cal/gm (Ref. 1); and
- d. Fuel design limits required by GDC 26 (Ref. 2) for the condition when control rods must be capable of shutting down the reactor with a minimum required Shutdown Margin with the highest worth control rod stuck fully withdrawn.

For transients that may be DNB limited,  $F_{\Delta H}^N$  is a significant core parameter. The limits on  $F_{\Delta H}^N$  ensure that the DNB design criterion is met for normal operation, operational transients, and any transients arising from events of moderate frequency. Refer to the Bases for LCO 3.4.1, "RCS Pressure, Temperature, and Flow DNB Limits," for a discussion of the applicable Departure from Nucleate Boiling Ratio (DNBR) limits.

## BASES

## APPLICABLE SAFETY ANALYSES (continued)

The allowable  $F_{\Delta H}^N$  limit increases with decreasing power level. This functionality in  $F_{\Delta H}^N$  is included in the analyses that provide the Reactor Core Safety Limits (SLs) of SL 2.1.1. Therefore, any DNB events in which the calculation of the core limits is modeled implicitly use this variable value of  $F_{\Delta H}^N$  in the analyses. Likewise, all transients that may be DNB limited are assumed to begin with an initial  $F_{\Delta H}^N$  as a function of power level defined by the COLR limit equation.

The LOCA safety analysis indirectly models  $F_{\Delta H}^N$  as an input parameter. The Nuclear Heat Flux Hot Channel Factor ( $F_Q(Z)$ ) and the axial peaking factors are inserted directly into the LOCA safety analyses that verify the acceptability of the resulting peak cladding temperature (Ref. 3).

The fuel is protected in part by Technical Specifications, which ensure that the initial conditions assumed in the safety and accident analyses remain valid. The following LCOs ensure this: LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.1, "Heat Flux Hot Channel Factor ( $F_Q(Z)$ )," LCO 3.2.2, LCO 3.2.3, and LCO 3.2.4.

$F_{\Delta H}^N$  and  $F_Q(Z)$  are measured periodically using the movable incore detector system. Measurements are generally taken with the core at, or near, steady state conditions. Core monitoring and control under transient conditions (Condition 1 events) are accomplished by operating the core within the limits of the LCOs on AFD, QPTR, and Control Bank Insertion Limits.

$F_{\Delta H}^N$  satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## LCO

$F_{\Delta H}^N$  shall be maintained within the limits of the relationship provided in the COLR.

The  $F_{\Delta H}^N$  limit identifies the coolant flow channel with the maximum enthalpy rise. This channel has the least heat removal capability and thus the highest probability for a DNB.

## BASES

## LCO (continued)

The limiting value of  $F_{\Delta H}^N$ , described by the equation contained in the COLR, is the design radial peaking factor used in the plant safety analyses.

The power multiplication factor in this equation provides margin for higher radial peaking from reduced thermal feedback and greater control rod insertion at low power levels. The limiting value of  $F_{\Delta H}^N$  is allowed to increase 0.3% for every 1% RTP reduction in THERMAL POWER.

## APPLICABILITY

The  $F_{\Delta H}^N$  limits must be maintained in MODE 1 to prevent core power distributions from exceeding the fuel design limits for DNBR and PCT. Applicability in other modes is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power. Specifically, the design bases events that are sensitive to  $F_{\Delta H}^N$  in other modes (MODES 2 through 5) have significant margin to DNB, and therefore, there is no need to restrict  $F_{\Delta H}^N$  in these modes.

## ACTIONS

A.1, A.2, A.3, and A.4

With  $F_{\Delta H}^N$  exceeding its limit, Condition A is entered.  $F_{\Delta H}^N$  may be restored to within its limits within 4 hours, through, for example, realigning any misaligned rods or reducing power enough to bring  $F_{\Delta H}^N$  within its power dependent limit. If the value of  $F_{\Delta H}^N$  is not restored to within its specified limit, THERMAL POWER must be reduced to < 50% RTP in accordance with Required Action A.1. When the  $F_{\Delta H}^N$  limit is exceeded, the DNBR limit is not likely violated in steady state operation, because events that could significantly perturb the  $F_{\Delta H}^N$  value (e.g., static control rod misalignment) are considered in the safety analyses.

## BASES

## ACTIONS (continued)

However, the DNBR limit may be violated if a DNB limiting event occurs. Reducing THERMAL POWER to < 50% RTP increases the DNB margin and is not likely to cause the DNBR limit to be violated in steady state operation. Thus, the allowed Completion Time of 4 hours provides an acceptable time to restore  $F_{\Delta H}^N$  to within its limits without allowing the unit to remain in an unacceptable condition for an extended period of time.

Condition A is modified by a Note that requires that Required Actions A.2 and A.4 must be completed whenever Condition A is entered. Thus, even if  $F_{\Delta H}^N$  is restored within the 4 hour time period of Required Action A.1, Required Action A.2 would nevertheless require another measurement and calculation of  $F_{\Delta H}^N$  within 24 hours in accordance with SR 3.2.2.1. Required Action A.4 requires that another determination of  $F_{\Delta H}^N$  must be done prior to exceeding 50% RTP, prior to exceeding 75% RTP, and within 24 hours after reaching or exceeding 95% RTP.

Required Action A.2 requires an incore flux map (SR 3.2.2.1) be obtained and the measured value of  $F_{\Delta H}^N$  verified not to exceed the allowed limit at the lower power level once the power level has been reduced to < 50% RTP per Required Action A.1. The unit is provided 20 additional hours to perform this task over and above the 4 hours allowed by Action A.1. The Completion Time of 24 hours is acceptable because of the increase in the DNB margin, which is obtained at lower power levels, and the low probability of having a DNB limiting event within this 24 hour period. Additionally, operating experience has indicated that this Completion Time is sufficient to obtain the incore flux map, perform the required calculations, and evaluate  $F_{\Delta H}^N$ .

If the value of  $F_{\Delta H}^N$  is not restored to within its specified limit either by adjusting a misaligned rod or by reducing THERMAL POWER, Required Action A.3 requires the Power Range Neutron Flux-High trip setpoints be reduced to  $\leq 55\%$  RTP. The reduction in trip setpoints ensures that continuing operation remains at an acceptable low power level with adequate DNBR margin.

## BASES

### ACTIONS (continued)

The allowed Completion Time of 72 hours to reset the trip setpoints per Required Action A.3 recognizes that, once power is reduced, the safety analysis assumptions are satisfied and there is no urgent need to reduce the trip setpoints. This is a sensitive operation that may inadvertently trip the Reactor Protection System.

Required Action A.4 requires verification that F<sub>ΔH</sub><sup>N</sup> is within its specified limits after an out of limit occurrence. This ensures that the cause that led to the F<sub>ΔH</sub><sup>N</sup> exceeding its limit is corrected, and that subsequent operation proceeds within the LCO limit. This Action demonstrates that the F<sub>ΔH</sub><sup>N</sup> limit is within the LCO limits prior to exceeding 50% RTP, again prior to exceeding 75% RTP, and within 24 hours after THERMAL POWER is ≥ 95% RTP.

This Required Action is modified by a Note that states that THERMAL POWER does not have to be reduced to comply with this Required Action.

#### B.1

If the Required Actions of A.1 through A.4 are not met within their associated Completion Times, the unit must be placed in a MODE in which the LCO requirements are not applicable. This is done by placing the unit in at least MODE 2 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience regarding the amount of time it takes to reach MODE 2 from full power operation in an orderly manner and without challenging plant systems.

BASES
 

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 SURVEILLANCE  
 REQUIREMENTS

SR 3.2.2.1

The value of  $F_{\Delta H}^N$  is determined by using the movable incore detector system to obtain a flux distribution map. A data reduction computer program then calculates the maximum value of  $F_{\Delta H}^N$  from the measured flux distributions. The measured value of  $F_{\Delta H}^N$  must be multiplied by 1.04 to account for measurement uncertainty before making comparisons to the  $F_{\Delta H}^N$  limit.

After each refueling,  $F_{\Delta H}^N$  must be determined in MODE 1 prior to exceeding 75% RTP. This requirement ensures that  $F_{\Delta H}^N$  limits are met at the beginning of each fuel cycle.

The 31 EFPD Frequency is acceptable because the power distribution changes relatively slowly over this amount of fuel burnup. Accordingly, this Frequency is short enough that the  $F_{\Delta H}^N$  limit cannot be exceeded for any significant period of operation.

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## REFERENCES

1. UFSAR, Section 15.4.8.
2. 10 CFR 50, Appendix A, GDC 26.
3. 10 CFR 50.46.

BASES

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## B 3.2 POWER DISTRIBUTION LIMITS

### B 3.2.3 AXIAL FLUX DIFFERENCE (AFD)

#### BASES

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#### BACKGROUND

The purpose of this LCO is to establish limits on the values of the AFD in order to limit the axial power distribution skewing to either the top or bottom of the core. By limiting the amount of power distribution skewing, core peaking factors are consistent with the assumptions used in the safety analyses. Limiting power distribution skewing over time also minimizes the xenon distribution skewing, which is a significant factor in axial power distribution control.

The operating scheme used to control the axial power distribution uses the Constant Axial Offset Control (CAOC) Methodology. This methodology involves maintaining the AFD within a tolerance band around a burnup dependent target, known as the target flux difference, to minimize the variation of the axial peaking factor and axial xenon distribution during unit maneuvers.

The target flux difference is determined at equilibrium xenon conditions. The control banks must be positioned within the core in accordance with their insertion limits and Control Bank D should be inserted near its normal position for steady state operation at high power levels. The power level should be as near RTP as practical. The value of the target flux difference obtained under these conditions divided by the Fraction of RTP is the target flux difference at RTP for the associated core burnup conditions. Target flux differences for other THERMAL POWER levels are obtained by multiplying the RTP value by the appropriate fractional THERMAL POWER level.

## BASES

## BACKGROUND (continued)

The AFD is monitored on an automatic basis using the plant process computer that has an AFD monitor alarm. The frequency of monitoring the AFD by the plant computer is once per minute providing an essentially continuous accumulation of penalty deviation time that allows the operator to accurately assess the status of the penalty deviation time. The computer determines the 1 minute average of each of the OPERABLE excore detector outputs and provides an alarm message immediately if the AFDs for two or more OPERABLE excore channels are outside the target band and the THERMAL POWER is > 90% RTP. During operation at THERMAL POWER levels < 90% RTP but > 15% RTP, the computer sends an alarm message when the cumulative penalty deviation time is > 1 hour in the previous 24 hours.

Periodic updating of the target flux difference value is necessary to follow the change of the flux difference at steady state conditions with burnup.

The Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ) and QPTR LCOs limit the radial component of the peaking factors.

APPLICABLE  
SAFETY ANALYSES

The AFD is a measure of axial power distribution skewing to the top or bottom half of the core. The AFD is sensitive to many core related parameters such as control bank positions, core power level, axial burnup, axial xenon distribution and, to a lesser extent, reactor coolant temperature and boron concentrations. The allowed range of the AFD is used in the nuclear design process to confirm that operation within these limits produces core peaking factors and axial power distributions that meet safety analysis requirements.

BASES

APPLICABLE SAFETY ANALYSES (continued)

The CAOC methodology (Refs. 1, 2, and 3) entails:

- a. Establishing an envelope of allowed power shapes and power densities;
- b. Devising an operating strategy for the cycle that maximizes unit flexibility (maneuvering) and minimizes axial power shape changes;
- c. Demonstrating that this strategy does not result in core conditions that violate the envelope of permissible core power characteristics; and
- d. Demonstrating that this power distribution control scheme can be effectively supervised with excore detectors.

The limits on the AFD ensure that the Heat Flux Hot Channel Factor ( $F_0(Z)$ ) is not exceeded during either normal operation or in the event of xenon redistribution following power changes. The limits on the AFD also limit the range of power distributions that are assumed as initial conditions in analyzing Condition 2, 3, and 4 events. This ensures that fuel cladding integrity is maintained for these postulated accidents. The most important Condition 4 event is the loss of coolant accident. The most significant Condition 3 event is the loss of flow accident. The most significant Condition 2 events are uncontrolled bank withdrawal and boration or dilution accidents. Condition 2 accidents, assumed to begin from within the AFD limits, are used to confirm the adequacy of Overpower  $\Delta T$  and Overtemperature  $\Delta T$  trip setpoints.

The limits on the AFD provide assurance that the thermal limits assumed in the accident analysis ( $F_{\Delta H}^N$  and  $F_0(Z)$ ) are met. Thereby, the AFD satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The shape of the power profile in the axial (i.e., the vertical) direction is largely under the control of the operator, through either the manual operation of the control banks, or automatic motion of control banks responding to temperature deviations resulting from either manual operation of the Chemical and Volume Control System to change boron concentration, or from power level changes.

Signals are available to the operator from the Nuclear Instrumentation System (NIS) excore neutron detectors (Ref. 4). Separate signals are taken from the top and bottom detectors. The AFD is defined as the difference in normalized flux signals between the top and bottom excore detector in each detector well. For convenience, this flux difference is converted to provide flux difference units expressed as a percentage and labeled as  $\% \Delta$  flux or  $\% \Delta I$ .

With THERMAL POWER  $\geq$  90% RTP (i.e., Part a of this LCO), the AFD must be kept within the target band about the target flux difference. With the AFD outside the target band with THERMAL POWER  $\geq$  90% RTP, the assumptions of the accident analyses may be violated.

It is intended that the unit is operated with the AFD within the target band about the target flux difference. However, during rapid THERMAL POWER reductions, control bank motion may cause the AFD to deviate outside of the target band at reduced THERMAL POWER levels. This deviation does not affect the xenon distribution sufficiently to change the envelope of peaking factors that may be reached on a subsequent return to RTP with the AFD within the target band, provided the time duration of the deviation is limited. Accordingly, while THERMAL POWER is  $\geq$  50% RTP and  $<$  90% RTP (i.e., Part b of this LCO), a 1 hour cumulative penalty deviation time limit, cumulative during the preceding 24 hours, is allowed during which the unit may be operated outside of the target band but within the acceptable operation limits provided in the COLR.

## BASES

## LCO (continued)

For THERMAL POWER levels  $> 15\%$  RTP and  $< 50\%$  RTP (i.e., Part c of this LCO), deviations of the AFD outside of the target band are less significant. The accumulation of 0.5 minute penalty deviation time per 1 minute of actual time outside the target band reflects this reduced significance. With THERMAL POWER  $< 15\%$  RTP, AFD is not a significant parameter in the assumptions used in the safety analysis and, therefore, requires no limits. Because the xenon distribution produced at THERMAL POWER levels less than RTP does affect the power distribution as power is increased, unanalyzed xenon and power distribution is prevented by limiting the accumulated penalty deviation time. The cumulative penalty time is the sum of penalty times identified in Parts a, b, and c of this LCO.

This LCO is modified by four Notes. Note 1 modifies Part a of this LCO by stating conditions necessary for declaring the AFD outside of the target band. The required target band varies with axial burnup distribution, which in turn varies with the core average accumulated burnup. The target band defined in the COLR may provide one target band for the entire cycle or more than one band, each to be followed for a specific range of cycle burnup. Notes 2 and 3 modify Parts b and c of this LCO by describing how the cumulative penalty deviation time is calculated. Note 2 states that with THERMAL POWER  $\geq 50\%$  RTP the penalty deviation time is accumulated at the rate of 1 minute for each 1 minute of power operation with AFD outside the target band. Note 3 states that with THERMAL POWER  $> 15\%$  and  $< 50\%$  RTP the penalty deviation time is accumulated at the rate of 0.5 minutes for each 1 minute of power operation with AFD outside the target band. Note 4 addresses AFD outside of the target band during the performance of Surveillances. For surveillance of the power range channels performed according to SR 3.3.1.6, deviation outside the target band is permitted for 16 hours during each calibration without accumulating penalty deviation time. Some deviation in the AFD may be required for doing NIS calibration with the incore detector system due to oscillations. This calibration is performed every 92 days.

BASES

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LCO (continued)

Violating the LCO on the AFD could produce unacceptable consequences if a Condition 2, 3, or 4 event occurs while the AFD is outside its limits.

The COLR contains the figure showing the target band and AFD acceptable operating limits.

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APPLICABILITY

AFD requirements are applicable in MODE 1 above 15% RTP. Above 50% RTP, the combination of THERMAL POWER and core peaking factors are the core parameters of primary importance in safety analyses (Ref. 1).

Between 15% RTP and 90% RTP, this LCO provides penalty deviation time limits to ensure that the distributions of xenon are consistent with safety analysis assumptions.

At or below 15% RTP and for lower operating MODES, the stored energy in the fuel and the energy being transferred to the reactor coolant are low. The value of the AFD in these conditions does not affect the consequences of the design basis events.

Low signal levels in the excore channels may preclude obtaining valid AFD signals below 15% RTP.

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ACTIONS

A.1

With the AFD outside the target band and THERMAL POWER  $\geq$  90% RTP, the assumptions used in the accident analyses may be violated with respect to the maximum heat generation. Therefore, a Completion Time of 15 minutes is allowed to restore the AFD to within the target band because xenon distributions change little in this relatively short time.

## BASES

## ACTIONS (continued)

B.1

If the AFD cannot be restored within the target band per Required Action A.1, then reducing THERMAL POWER to  $< 90\%$  RTP places the core in a condition that has been analyzed and found to be acceptable, provided that the AFD is within the acceptable operation limits provided in the COLR.

The allowed Completion Time of 15 minutes provides an acceptable time to reduce power to  $< 90\%$  RTP without allowing the unit to remain in an unanalyzed condition for an extended period of time.

C.1

With THERMAL POWER  $< 90\%$  RTP but  $\geq 50\%$  RTP, operation with the AFD outside the target band is allowed for up to 1 hour if the AFD is within the acceptable operation limits provided in the COLR. With the AFD within these limits, the resulting axial power distribution is acceptable as an initial condition for accident analyses assuming the then existing xenon distributions. The 1 hour cumulative penalty deviation time restricts the extent of xenon redistribution. Without this limitation, unanalyzed xenon axial distributions may result from a different pattern of xenon buildup and decay. The reduction to a power level  $< 50\%$  RTP puts the reactor at a THERMAL POWER level at which the AFD is not a significant accident analysis parameter.

With THERMAL POWER  $< 90\%$  RTP, but  $\geq 50\%$  RTP and the indicated AFD outside the acceptable operation limits provided in the COLR, the peaking factors assumed in accident analysis may be exceeded with the existing xenon condition. Any AFD within the target band is acceptable regardless of its relationship to the acceptable operation limits. The Completion Time of 30 minutes allows for a prompt, yet orderly, reduction in power.

This Required Action must also be implemented either if the cumulative penalty deviation time is  $> 1$  hour during the previous 24 hours, or the AFD is not within the target band and not within the acceptable operation limits.

## BASES

### ACTIONS (continued)

Condition C is modified by a Note that requires that Required Action C.1 must be completed whenever this Condition is entered.

#### D.1

If Required Action C.1 is not completed within its required Completion Time of 30 minutes, the axial xenon distribution starts to become significantly skewed with the THERMAL POWER  $\geq 50\%$  RTP. In this situation, the assumption that a cumulative penalty deviation time of 1 hour or less during the previous 24 hours while the AFD is outside its target band is acceptable at  $< 50\%$  RTP, is no longer valid.

Reducing the power level to  $< 15\%$  RTP within the Completion Time of 9 hours and complying with LCO penalty deviation time requirements for subsequent increases in THERMAL POWER ensure that acceptable xenon conditions are restored.

Condition D is modified by a Note that requires Action D.1 be completed whenever this Condition is entered.

### SURVEILLANCE REQUIREMENTS

#### SR 3.2.3.1

This Surveillance verifies that the AFD as indicated by the NIS excore channels is within the target band. The Surveillance Frequency of 7 days is adequate because the AFD is controlled by the operator and monitored by the process computer. Furthermore, any deviations of the AFD from the target band that is not alarmed should be readily noticed.

The AFD should be monitored and logged more frequently in periods of operation for which the power level or control bank positions are changing to allow corrective measures when the AFD is more likely to move outside the target band.



## BASES

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SURVEILLANCE REQUIREMENTS (continued)SR 3.2.3.2

This Surveillance requires that the target flux difference is updated by performing SR 3.2.3.3 within 31 Effective Full Power days (EFPD) after each refueling and every 31 EFPD thereafter to account for small changes that may occur in the target flux differences in that period due to burnup.

Alternatively, linear interpolation between the most recent measurement of the target flux differences and a predicted end of cycle value provides a reasonable update because the AFD changes due to burnup tend toward 0% AFD.

SR 3.2.3.3

Measurement of the target flux difference is accomplished by different methods. One method utilizes a flux map when the core is at equilibrium xenon conditions, preferably at high power levels with the control banks nearly withdrawn. This flux map provides the equilibrium axial power distribution from which the target value can be determined. A second method utilizes accumulated plant data, collected at specified plant conditions. The accumulated plant data provides the equilibrium axial power distribution from which the target value can be determined. Target flux difference is set to maintain core power shape near an optimal value. The target flux difference varies slowly with core burnup.

A Frequency of once within 31 EFPD after each refueling and every 92 EFPD thereafter for remeasuring the target flux differences adjusts the target flux difference for each excore channel to the value measured at steady state conditions. This is the basis for the CAOC. Remeasurement at this Surveillance interval also establishes the AFD target flux difference values that account for changes in incore/excore calibrations that may have occurred in the interim.

This SR is modified by a Note to allow the predicted end of cycle AFD from the cycle nuclear design to be used to determine the initial target flux difference after each refueling.

BASES

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REFERENCES

1. WCAP-8403 (nonproprietary), "Power Distribution Control and Load Following Procedures," Westinghouse Electric Corporation, September 1974.
2. T. M. Anderson to K. Kniel (Chief of Core Performance Branch, NRC), Attachment: "Operation and Safety Analysis Aspects of an Improved Load Follow Package," January 31, 1980.
3. C. Eicheldinger to D. B. Vassallo (Chief of Light Water Reactors Branch, NRC), Letter NS-CE-687, July 16, 1975.
4. UFSAR, Section 7.7.1.3.1.

## B 3.2 POWER DISTRIBUTION LIMITS

### B 3.2.4 QUADRANT POWER TILT RATIO (QPTR)

#### BASES

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#### BACKGROUND

The QPTR limit ensures that the gross radial power distribution remains consistent with the design values used in the safety analyses. Precise radial power distribution measurements are made during startup testing, after refueling, and periodically during power operation.

The power density at any point in the core must be limited so that the fuel design criteria are maintained. Together, LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, provide limits on process variables that characterize and control the three dimensional power distribution of the reactor core. Control of these variables ensures that the core operates within the fuel design criteria and that the power distribution remains within the bounds used in the safety analyses.

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#### APPLICABLE SAFETY ANALYSES

Limits on QPTR preclude core power distributions that violate the following fuel design criteria:

- a. During a large break loss of coolant accident, the peak cladding temperature must not exceed 2200°F (Ref. 1);
  - b. During a loss of forced reactor coolant flow accident, there must be at least 95% probability at the 95% confidence level (the 95/95 Departure from Nucleate Boiling (DNB) criterion) that the hot fuel rod in the core does not experience a DNB condition;
  - c. During an ejected rod accident, the prompt energy deposition to the fuel must not exceed 200 cal/gm (Ref. 2); and
  - d. The control rods must be capable of shutting down the reactor with a minimum required Shutdown Margin with the highest worth control rod stuck fully withdrawn (Ref. 3).
-

## BASES

### APPLICABLE SAFETY ANALYSES (continued)

The LCO limits on the AFD, the QPTR, the Heat Flux Hot Channel Factor ( $F_Q(Z)$ ), the Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ), and control bank insertion, sequence and overlap limits are established to preclude core power distributions that exceed the safety analyses limits.

The QPTR limits ensure that  $F_{\Delta H}^N$  and  $F_Q(Z)$  remain below their limiting values by preventing an undetected change in the gross radial power distribution.

In MODE 1, the  $F_{\Delta H}^N$  and  $F_Q(Z)$  limits must be maintained to preclude core power distributions from exceeding design limits assumed in the safety analyses.

The limits on the QPTR provide assurance that the thermal limits assumed in the accident analysis ( $F_{\Delta H}^N$  and  $F_Q(Z)$ ) are met. Thereby, the QPTR satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## LCO

The QPTR limit of 1.02, at which corrective action is required, provides a margin of protection for both the DNB ratio and linear heat generation rate contributing to excessive power peaks resulting from X-Y plane power tilts. A limiting QPTR of 1.02 can be tolerated before the margin for uncertainty in  $F_Q(Z)$  and  $F_{\Delta H}^N$  is possibly challenged.

## APPLICABILITY

The QPTR limit must be maintained in MODE 1 with THERMAL POWER > 50% RTP to prevent core power distributions from exceeding the design limits.

Applicability in MODE 1  $\leq$  50% RTP and in other MODES is not required because there is neither sufficient stored energy in the fuel nor sufficient energy being transferred to the reactor coolant to require the implementation of a QPTR limit on the distribution of core power. The QPTR limit in these conditions is, therefore, not important. Note that the  $F_{\Delta H}^N$  and  $F_Q(Z)$  LCOs still apply below 50% RTP, but allow progressively higher peaking factors as THERMAL POWER decreases below 50% RTP.

## BASES

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### ACTIONS

#### A.1

With the QPTR exceeding its limit, a power level reduction of 3% from RTP for each 1% by which the QPTR exceeds 1.00 is a conservative tradeoff of total core power with peak linear power. The Completion Time of 2 hours allows sufficient time to identify the cause and correct the tilt. Note that the power reduction itself may cause a change in the tilted condition.

The maximum allowable power level initially determined by Required Action A.1 may be affected by subsequent determinations of QPTR. Increases in QPTR would require power reductions within 2 hours of QPTR determination, if necessary to comply with the decreased maximum allowable power level. Decreases in QPTR would allow increasing the maximum allowable power level and increasing power up to this revised limit.

#### A.2

After completion of Required Action A.1, periodic monitoring provides a basis for maintaining the appropriate reduced power level. As such, a check of the QPTR is required once per 12 hours. If the QPTR continues to increase, THERMAL POWER has to be reduced accordingly, such that it is maintained at a reduced power level of 3% from RTP for each 1% by which QPTR exceeds 1.00.

Any of the Surveillance methods for determining QPTR may be used within the constraints for acceptability of the Surveillance (i.e., if the excore detectors are available, they should be used; if the excore detectors are not available, the moveable incore detectors may be used). A 12 hour Completion Time is sufficient because any additional change in QPTR should be relatively slow. Further, this Completion Time is consistent with the Frequency required for the Surveillances with an inoperable alarm or instrumentation.

BASES

ACTIONS (continued)

A.3

The peaking factors  $F_{\Delta H}^N$  and  $F_0(Z)$  are of primary importance in ensuring that the power distribution remains consistent with the initial conditions used in the safety analyses. Performing SRs on  $F_{\Delta H}^N$  and  $F_0(Z)$  within 24 hours after achieving equilibrium conditions from a THERMAL POWER reduction per Required Action A.1 ensures that these primary indicators of power distribution are within their respective limits. Equilibrium conditions are achieved when the core is sufficiently stable at intended operating conditions to support flux mapping. The Completion Time takes into consideration the rate at which peaking factors are likely to change, and the time required to stabilize the unit and perform a flux map. If these peaking factors are not within their limits, the Required Actions of these Surveillances provide an appropriate response for the abnormal condition. If the QPTR remains above its specified limit, the peaking factor surveillances are required each 7 days thereafter to evaluate  $F_{\Delta H}^N$  and  $F_0(Z)$  with changes in power distribution. Relatively small changes are expected due to either burnup and xenon redistribution or correction of the cause for exceeding the QPTR limit.

A.4

Although  $F_{\Delta H}^N$  and  $F_0(Z)$  are of primary importance as initial conditions in the safety analyses, other changes in the power distribution may occur as the QPTR limit is exceeded and may have an impact on the validity of the safety analysis. A change in the power distribution can affect such reactor parameters as control bank worths and peaking factors for rod malfunction accidents. When the QPTR exceeds its limit, it does not necessarily mean a safety concern exists. It does mean that there is an indication of a change in the gross radial power distribution that requires an investigation and evaluation that is accomplished by examining the incore power distribution. Specifically, the core peaking factors and the quadrant tilt must be evaluated because they are the factors that best characterize the core power distribution. This re-evaluation is required to ensure that, before increasing THERMAL POWER to above the limit of Required Action A.1, the reactor core conditions are consistent with the assumptions in the safety analyses.

BASES

ACTIONS (continued)

A.5

If the QPTR has exceeded the 1.02 limit and a re-evaluation of the safety analysis is completed and shows that safety requirements are met, the excore detectors are normalized to restore QPTR to within limit prior to increasing THERMAL POWER to above the limit of Required Action A.1. Normalization is accomplished in such a manner that the indicated QPTR following normalization is near 1.00. This is done to detect any subsequent significant changes in QPTR.

Required Action A.5 is modified by two Notes. Note 1 states that the quadrant power tilt (QPT) is not restored to within limits until after the re-evaluation of the safety analysis has determined that core conditions are within the safety analysis assumptions (i.e., Required Action A.4). Note 2 states that if Required Action A.5 is performed, then Required Action A.6 shall be performed. Required Action A.5 normalizes the excore detectors to restore QPTR to within limits, which restores compliance with LCO 3.2.4. Thus, Note 2 prevents exiting the Actions prior to completing flux mapping to verify peaking factors, per Required Action A.6. These Notes are intended to prevent any ambiguity about the required sequence of actions.

A.6

Once the flux tilt is restored to within limits (i.e., Required Action A.5 is performed), it is acceptable to return to full power operation. However, as an added check that the core power distribution is consistent with the safety analysis assumptions, Required Action A.6 requires verification that  $F_0(Z)$  and  $F_{\Delta H}^N$  are within their specified limits within 24 hours after achieving equilibrium conditions at RTP. As an added precaution, if the core power does not reach RTP within 24 hours, but is increased slowly, then the peaking factor surveillances must be performed within 48 hours after increasing THERMAL POWER above the limit of Required Action A.1. These Completion Times are intended to allow adequate time to increase THERMAL POWER to above the limit of Required Action A.1, while not permitting the core to remain with unconfirmed power distributions for extended periods of time.

BASES

ACTIONS (continued)

Required Action A.6 is modified by a Note that states that the peaking factor surveillances may only be done after the excore detectors have been normalized to restore QPTR to within limits (i.e., Required Action A.5). The intent of this Note is to have the peaking factor surveillances performed at operating power levels, which can only be accomplished after the excore detectors are normalized to restore QPTR to within limits and the core returned to power.

B.1

If Required Actions A.1 through A.6 are not completed within their associated Completion Times, the unit must be brought to a MODE or condition in which the requirements do not apply. To achieve this status, THERMAL POWER must be reduced to  $\leq 50\%$  RTP within 4 hours. The allowed Completion Time of 4 hours is reasonable, based on operating experience regarding the amount of time required to reach the reduced power level without challenging plant systems.

SURVEILLANCE  
REQUIREMENTS

SR 3.2.4.1

This Surveillance verifies that the QPTR, as indicated by the Nuclear Instrumentation System (NIS) excore channels, is within its limits. The Frequency of 7 days takes into account other information and alarms available to the operator in the control room.

This SR is modified by two Notes. Note 1 allows QPTR to be calculated with three power range channels if THERMAL POWER is  $\leq 75\%$  RTP and the input from one Power Range Neutron Flux channel is inoperable. Note 2 allows performance of SR 3.2.4.2 in lieu of SR 3.2.4.1.

For those causes of QPT that occur quickly (e.g., a dropped rod), there typically are other indications of abnormality that prompt a verification of core power tilt.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.2.4.2

With input from an NIS power range channel inoperable, tilt monitoring for a portion of the reactor core becomes degraded. Large tilts are likely detected with the remaining channels, but the capability for detection of small power tilts in some quadrants is decreased. The Frequency of 12 hours provides an accurate alternative means for ensuring that any tilt remains within its limits.

For purposes of monitoring the QPTR when input from one power range channel is inoperable, the moveable incore detectors are used to confirm that the normalized symmetric power distribution is consistent with the indicated QPTR and any previous data indicating a tilt. The incore detector monitoring is performed with a full incore flux map or two sets of four thimble locations with quarter core symmetry. The two sets of four symmetric thimbles is a set of eight unique detector locations.

The symmetric thimble flux map can be used to generate symmetric thimble "tilt." This can be compared to a reference symmetric thimble tilt, from the most recent full core flux map, to generate an incore QPTR. Therefore, incore monitoring of the radial core tilt to verify the QPTR can be used to confirm that QPTR is within limits.

With input from one NIS channel inoperable, the indicated tilt may be changed from the value indicated with input from all four channels OPERABLE. To confirm that no change in tilt has actually occurred, which might cause the QPTR limit to be exceeded, the incore result may be compared against previous flux maps either using the symmetric thimbles as described above or a complete flux map. Nominally, quadrant tilt from the Surveillance should be within 2% of the tilt shown by the most recent flux map data.

This Surveillance is modified by a Note, which states that it is not required to be performed until 12 hours after the input from one Power Range Neutron Flux channel is inoperable and the THERMAL POWER is > 75% RTP.

BASES

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REFERENCES

1. 10 CFR 50.46.
2. UFSAR, Section 15.4.8.
3. 10 CFR 50, Appendix A, GDC 26.

## B 3.3 INSTRUMENTATION

### B 3.3.1 Reactor Trip System (RTS) Instrumentation

#### BASES

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#### BACKGROUND

The RTS initiates a unit shutdown, based on the values of selected unit parameters, to protect against violating the core fuel design limits and Reactor Coolant System (RCS) pressure boundary during Anticipated Operational Occurrences (AOOs) and to assist the Engineered Safety Features (ESF) Systems in mitigating accidents.

The protection and monitoring systems have been designed to assure safe operation of the reactor. This is achieved by specifying Limiting Safety System Settings (LSSS) in terms of parameters directly monitored by the RTS, as well as specifying LCOs on other reactor system parameters and equipment performance.

The LSSS, defined in this specification as the Allowable Values, in conjunction with the LCOs, establish the threshold for protective system action to prevent exceeding acceptable limits during Design Basis Accidents (DBAs).

During AOOs, which are those events expected to occur one or more times during the unit life, the acceptable limits are:

1. The Departure from Nucleate Boiling Ratio (DNBR) shall be maintained above the Safety Limit (SL) value to prevent Departure from Nucleate Boiling (DNB);
2. Fuel centerline melt shall not occur; and
3. The RCS pressure SL of 2735 psig shall not be exceeded.

Operation within the SLs of Specification 2.0, "Safety Limits (SLs)," also maintains the above values and assures that offsite dose will be within the 10 CFR 50 and 10 CFR 100 criteria during AOOs.

BASES

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BACKGROUND (continued)

Accidents are events that are analyzed even though they are not expected to occur during the unit life. The acceptable limit during accidents is that offsite dose shall be maintained within an acceptable fraction of 10 CFR 100 limits. Different accident categories are allowed a different fraction of these limits, based on probability of occurrence. Meeting the acceptable dose limit for an accident category is considered having acceptable consequences for that event.

The RTS instrumentation is segmented into four distinct but interconnected modules as identified below. The RTS process is illustrated in UFSAR, Chapter 7 (Ref. 1):

1. Field transmitters or process sensors: provide a measurable electronic signal based upon the physical characteristics of the parameter being measured;
2. Signal Process Control and Protection System, including Analog Protection System, Nuclear Instrumentation System (NIS), field contacts, and protection channel sets: provide signal conditioning, bistable setpoint comparison, process algorithm actuation, compatible electrical signal output to protection system devices, and control board/control room/miscellaneous indications;
3. Solid State Protection System (SSPS), including input, logic, and output bays: initiates proper unit shutdown and/or ESF actuation in accordance with the defined logic, which is based on the bistable outputs from the signal process control and protection system; and
4. Reactor trip switchgear, including Reactor Trip Breakers (RTBs) and bypass breakers: provides the means to interrupt power to the Control Rod Drive Mechanisms (CRDMs) and allows the Rod Cluster Control Assemblies (RCCAs), or "rods," to fall into the core and shut down the reactor. The bypass breakers allow testing of the RTBs at power.

BASES

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BACKGROUND (continued)

Field Transmitters or Sensors

To meet the design demands for redundancy and reliability, more than one, and often as many as four, field transmitters or sensors are used to measure unit parameters. To account for the calibration tolerances and instrument drift, which are assumed to occur between calibrations, statistical allowances are provided in the Trip Setpoint and Allowable Values. The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against its documented acceptance criteria.

Signal Process Control and Protection System

Generally, three or four channels of process control equipment are used for the signal processing of unit parameters measured by the field instruments. The process control equipment provides signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with established setpoints. If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable is forwarded to the SSPS for decision evaluation. Channel separation is maintained up to and through the input bays. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the SSPS, while others provide input to the SSPS, the main control board, the plant computer, and one or more control systems.

Generally, if a parameter is used only for input to the protection circuits, three channels with a two-out-of-three logic are sufficient to provide the required reliability and redundancy. If one channel fails in a direction that would not result in a partial Function trip, the Function is still OPERABLE with a two-out-of-two logic. If one channel fails, such that a partial Function trip occurs, a trip will not occur and the Function is still OPERABLE with a one-out-of-two logic.

BASES

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BACKGROUND (continued)

Generally, if a parameter is used for input to the SSPS and a control function, four channels with a two-out-of-four logic are sufficient to provide the required reliability and redundancy. The circuit must be able to withstand both an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Again, a single failure will neither cause nor prevent the protection function actuation. These requirements are described in IEEE-279-1971 (Ref. 4). The actual number of channels required for each unit parameter is specified in Reference 1.

Two trains are required to ensure no single random failure of a logic channel will disable the RTS. The logic channels are designed such that testing required while the reactor is at power may be accomplished without causing a trip. Provisions to allow removing logic channels from service during maintenance are unnecessary because of the logic system's designed reliability.

Trip Setpoints and Allowable Values

Allowable Values provide a conservative margin with regards to instrument uncertainties to ensure that SLs are not violated during AOOs and that the consequences of DBAs will be acceptable providing the unit is operated from within the LCOs at the onset of the event and required equipment functions as designed. If the measured value of a bistable exceeds the Allowable Value without tripping, then the associated RTS Function is considered inoperable. Allowable Values for RTS Functions are specified in Table 3.3.1-1.

## BASES

### BACKGROUND (continued)

Trip Setpoints are the nominal values at which the bistables or setpoint comparators are set. The actual nominal Trip Setpoint entered into the bistable/comparator is more conservative than that specified by the Allowable Value to account for changes in normal measurement errors detectable by a CHANNEL OPERATIONAL TEST (COT). One example of such a change in measurement error is attributable to calculated normal uncertainties during the surveillance interval. Any bistable is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION tolerance. If the measured value of a bistable exceeds the Trip Setpoint but is within the Allowable Value, then the associated RTS Function is considered OPERABLE. Trip Setpoints are specified in the Technical Requirements Manual (Ref. 5).

Allowable Values and Trip Setpoints are based on a methodology which incorporates all of the known uncertainties applicable for each instrument channel. Reference 6 provides a detailed description of the methodology used to calculate the Allowable Values and Trip Setpoints, including their explicit uncertainties, for all instruments listed in Table 3.3.1-1 except the Turbine Trip Functions. The Allowable Values and Trip Setpoints for the Turbine Trip Functions are based on specific ComEd setpoint methodology.

#### Solid State Protection System

The SSPS equipment is used for the decision logic processing of outputs from the signal processing equipment bistables. To meet the redundancy requirements, two trains of SSPS, each performing the same functions, are provided. If one train is taken out of service for maintenance or test purposes, the second train will provide reactor trip and/or ESF actuation for the unit. If both trains are taken out of service or placed in test, a reactor trip will result. Each train is packaged in its own cabinet for physical and electrical separation to satisfy separation and independence requirements. The system has been designed to initiate a reactor trip in the event of a loss of power, directing the unit to a safe shutdown condition.

## BASES

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### BACKGROUND (continued)

The SSPS performs the decision logic for actuating a reactor trip or ESF actuation; generates the electrical output signal that will initiate the required trip or actuation, and provides the status, permissive, and annunciator output signals to the main control room of the unit.

The bistable outputs from the signal processing equipment are sensed by the SSPS equipment and combined into logic matrices that represent combinations indicative of various transients. If a required logic matrix combination is completed, the system will initiate a reactor trip or send actuation signals via master and slave relays to those components whose aggregate Function best serves to alleviate the condition and restore the unit to a safe condition. Examples are given in the Applicable Safety Analyses, LCO, and Applicability sections of this Bases.

#### Reactor Trip Switchgear

The RTBs are in the electrical power supply line from the control rod drive motor generator set power supply to the CRDMs. Opening of the RTBs interrupts power to the CRDMs, which allows the shutdown rods and control rods to fall into the core by gravity. Each RTB is equipped with a bypass breaker to allow testing of the RTB while the unit is at power. During normal operation the output from the SSPS is a voltage signal that energizes the undervoltage coils in the RTBs and bypass breakers, if in use. When the required logic matrix combination is completed, the SSPS output voltage signal is removed, the undervoltage coils are de-energized, the breaker trip lever is actuated by the de-energized undervoltage coil, and the RTBs and bypass breakers are tripped open. This allows the shutdown rods and control rods to fall into the core. In addition to the de-energization of the undervoltage coils, each breaker is also equipped with a shunt trip device that is energized to trip the breaker open upon receipt of a reactor trip signal (the Reactor Trip Bypass Breaker (RTBB) shunt trip device is energized only by a manual reactor trip signal). Either the undervoltage coil or the shunt trip mechanism is sufficient by itself, thus providing a diverse trip mechanism.



BASES

BACKGROUND (continued)

The decision logic matrix Functions are described in the functional diagrams included in Reference 1. In addition to the reactor trip or ESF, these diagrams also describe the various "permissive interlocks" that are associated with unit conditions. Each train has a built in testing device that can automatically test the decision logic matrix Functions and the actuation devices while the unit is at power. When any one train is taken out of service for testing, the other train is capable of providing unit monitoring and protection until the testing has been completed. The testing device is semiautomatic to minimize testing time.

APPLICABLE  
SAFETY ANALYSES,  
LCO, and  
APPLICABILITY

The RTS functions to maintain the SLs during all AOOs and mitigates the consequences of DBAs in all MODES in which the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

Each of the analyzed accidents and transients can be detected by one or more RTS Functions. The accident analysis described in Reference 3 takes credit for most RTS trip Functions. RTS trip Functions not specifically credited in the accident analysis are qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These RTS trip Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. They may also serve as backups to RTS trip Functions that were credited in the accident analysis.

The LCO requires all instrumentation performing an RTS Function, listed in Table 3.3.1-1 in the accompanying LCO, to be OPERABLE when the unit status is within the Applicability. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

## BASES

### APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO generally requires OPERABILITY of three or four channels in each instrumentation Function, two channels of Manual Reactor Trip in each logic Function, and two trains in each Automatic Trip Logic Function. Four OPERABLE instrumentation channels in a two-out-of-four configuration are required when one RTS channel is also used as a control system input. This configuration accounts for the possibility of the shared channel failing in such a manner that it creates a transient that requires RTS action. In this case, the RTS will still provide protection, even with random failure of one of the other three protection channels. Three OPERABLE instrumentation channels in a two-out-of-three configuration are generally required when there is no potential for control system and protection system interaction that could simultaneously create a need for RTS trip and disable one RTS channel. The two-out-of-three and two-out-of-four configurations allow one channel to be tripped during maintenance or testing without causing a reactor trip. Specific exceptions to the above general philosophy exist and are discussed below.

#### Reactor Trip System Functions

The safety analyses and OPERABILITY requirements applicable to each RTS Function are discussed below:

##### 1. Manual Reactor Trip

The Manual Reactor Trip ensures that the control room operator can initiate a reactor trip at any time by using either of two reactor trip switches in the control room. A Manual Reactor Trip accomplishes the same results as any one of the automatic trip Functions. It is used by the reactor operator to shut down the reactor whenever any parameter is rapidly trending toward its Trip Setpoint.

## BASES

### APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires two Manual Reactor Trip channels to be OPERABLE. Each channel is controlled by a manual reactor trip switch. Each channel activates the reactor trip breakers in both trains. Two independent channels are required to be OPERABLE so that no single random failure will disable the Manual Reactor Trip Function.

In MODE 1 or 2, manual initiation of a reactor trip must be OPERABLE. These are the MODES in which the shutdown rods and/or control rods are partially or fully withdrawn from the core. In MODE 3, 4, or 5, the manual initiation Function must also be OPERABLE if one or more shutdown rods or control rods are withdrawn or the Rod Control System is capable of withdrawing the shutdown rods or control rods. In this condition, inadvertent control rod withdrawal is possible. In MODE 3, 4, or 5, manual initiation of a reactor trip does not have to be OPERABLE if the Rod Control System is not capable of withdrawing the shutdown rods or control rods and if all rods are fully inserted. If the rods cannot be withdrawn from the core or all of the rods are inserted, there is no need to be able to trip the reactor. In MODE 6, the CRDMs are disconnected from the control rods and shutdown rods. Therefore, the manual initiation Function is not required.

#### 2. Power Range Neutron Flux

The NIS power range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS power range detectors provide input to the Rod Control System and the Steam Generator (SG) Water Level Control System. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Power Range Neutron Flux-High

The Power Range Neutron Flux-High trip Function ensures that protection is provided, from all power levels, against a positive reactivity excursion leading to DNB during power operations. These can be caused by rod withdrawal or reductions in RCS temperature.

The LCO requires all four of the Power Range Neutron Flux-High channels to be OPERABLE.

In MODE 1 or 2, when a positive reactivity excursion could occur, the Power Range Neutron Flux-High trip must be OPERABLE. This Function will terminate the reactivity excursion and shut down the reactor prior to reaching a power level that could damage the fuel. In MODE 3, 4, 5, or 6, the NIS power range detectors cannot detect neutron levels in this range. In these MODES, the Power Range Neutron Flux-High does not have to be OPERABLE because the reactor is shut down and reactivity excursions into the power range are extremely unlikely. Other RTS Functions and administrative controls provide protection against reactivity additions when in MODE 3, 4, 5, or 6.

b. Power Range Neutron Flux-Low

The LCO requirement for the Power Range Neutron Flux-Low trip Function ensures that protection is provided against a positive reactivity excursion from low power or subcritical conditions.

The LCO requires all four of the Power Range Neutron Flux-Low channels to be OPERABLE.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1, below the Power Range Neutron Flux (P-10 setpoint), and in MODE 2, the Power Range Neutron Flux-Low trip must be OPERABLE. This Function may be manually blocked by the operator when two out of four power range channels are greater than approximately 10% RTP (P-10 setpoint). This Function is automatically unblocked when three out of four power range channels are below the P-10 setpoint. Above the P-10 setpoint, positive reactivity additions are mitigated by the Power Range Neutron Flux-High trip Function.

In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-Low trip Function does not have to be OPERABLE because the reactor is shut down and the NIS power range detectors cannot detect neutron levels in this range. Other RTS trip Functions and administrative controls provide protection against positive reactivity additions or power excursions in MODE 3, 4, 5, or 6.

3. Power Range Neutron Flux Rate

The Power Range Neutron Flux Rate trips use the same channels as discussed for Function 2 above.

a. Power Range Neutron Flux-High Positive Rate

The Power Range Neutron Flux-High Positive Rate trip Function ensures that protection is provided against rapid increases in neutron flux that are characteristic of an RCCA drive rod housing rupture and the accompanying ejection of the RCCA. This Function compliments the Power Range Neutron Flux-High and Low Setpoint trip Functions to ensure that the criteria are met for a rod ejection from the power range.

The LCO requires all four of the Power Range Neutron Flux-High Positive Rate channels to be OPERABLE.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 or 2, when there is a potential to add a large amount of positive reactivity from a Rod Ejection Accident (REA), the Power Range Neutron Flux-High Positive Rate trip must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-High Positive Rate trip Function does not have to be OPERABLE because other RTS trip Functions and administrative controls will provide protection against positive reactivity additions.

b. Power Range Neutron Flux-High Negative Rate

The Power Range Neutron Flux-High Negative Rate trip Function ensures that protection is provided for multiple rod drop accidents. At high power levels, a multiple rod drop accident could cause local flux peaking that would result in an unconservative local DNBR. DNBR is defined as the ratio of the heat flux required to cause a DNB at a particular location in the core to the local heat flux. The DNBR is indicative of the margin to DNB. No credit is taken for the operation of this Function for those rod drop accidents in which the local DNBRs will be greater than the limit.

The LCO requires all four Power Range Neutron Flux-High Negative Rate channels to be OPERABLE.

In MODE 1 or 2, when there is potential for a multiple rod drop accident to occur, the Power Range Neutron Flux-High Negative Rate trip must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux-High Negative Rate trip Function does not have to be OPERABLE because the core is not critical and DNB is not a concern.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

4. Intermediate Range Neutron Flux

The Intermediate Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux-Low Setpoint trip Function. The NIS intermediate range detectors are located external to the reactor vessel and measure neutrons leaking from the core. Note that this Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

The LCO requires two channels of Intermediate Range Neutron Flux to be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function.

Because this trip Function is important only during startup, there is generally no need to disable channels for testing while the Function is required to be OPERABLE. Therefore, a third channel is unnecessary.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 below the P-10 setpoint, and in MODE 2 above the P-6 setpoint, when there is a potential for an uncontrolled RCCA bank rod withdrawal accident during reactor startup, the Intermediate Range Neutron Flux trip must be OPERABLE. Above the P-10 setpoint, the Power Range Neutron Flux-High Setpoint trip and the Power Range Neutron Flux-High Positive Rate trip provide core protection for a rod withdrawal accident. In MODE 2 below the P-6 setpoint, the Source Range Neutron Flux Trip provides the core protection for reactivity accidents. In MODE 3, 4, or 5, the Intermediate Range Neutron Flux trip does not have to be OPERABLE because the control rods must be fully inserted and only the shutdown rods may be withdrawn. The reactor cannot be started up in this condition. The core also has the required SDM to mitigate the consequences of a positive reactivity addition accident. In MODE 6, all rods are fully inserted and the core has a required increased SDM. Also, the NIS intermediate range detectors cannot detect neutron levels present in this MODE.

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux-Low trip Function. In MODES 3, 4, and 5, administrative controls also prevent the uncontrolled withdrawal of rods. The NIS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS source range detectors do not provide any inputs to control systems. The source range trip is the only RTS automatic protection function required in MODES 3, 4, and 5 when rods are capable of withdrawal or one or more rods are not fully inserted. Therefore, the functional capability at the specified Trip Setpoint is assumed to be available.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Source Range Neutron Flux Function provides protection for control rod withdrawal from subcritical, boron dilution and control rod ejection events.

In MODE 2 when below the P-6 setpoint, and in MODES 3, 4, and 5 when there is a potential for an uncontrolled RCCA bank withdrawal accident, two channels of Source Range Neutron Flux trip must be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function. Above the P-6 setpoint, the Intermediate Range Neutron Flux trip and the Power Range Neutron Flux-Low trip will provide core protection for reactivity accidents. Above the P-6 setpoint, the NIS source range detectors are de-energized.

In MODES 3, 4, and 5 with all rods fully inserted and the Rod Control System not capable of rod withdrawal, and in MODE 6, the outputs of the Function to RTS logic are not required OPERABLE. The requirements for the NIS source range detectors to monitor core neutron levels and provide indication of reactivity changes that may occur as a result of events like a boron dilution are addressed in LCO 3.3.9, "Boron Dilution Protection System (BDPS)" for MODE 3, 4, or 5 and LCO 3.9.3, "Nuclear Instrumentation," for MODE 6.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

6. Overtemperature  $\Delta T$

The Overtemperature  $\Delta T$  trip Function is provided to ensure that the design limit DNBR is met. This trip Function also limits the range over which the Overpower  $\Delta T$  trip Function must provide protection. The inputs to the Overtemperature  $\Delta T$  trip include pressurizer pressure, coolant temperature, axial power distribution, and reactor power as indicated by loop  $\Delta T$  assuming full reactor coolant flow. Protection from violating the DNBR limit is assured for those transients that are slow with respect to delays from the core to the measurement system. The Function monitors both variation in power and flow since a decrease in flow has a similar effect on  $\Delta T$  as a power increase. The Overtemperature  $\Delta T$  trip Function uses each loop's  $\Delta T$  as a measure of reactor power and is compared with a setpoint that is automatically varied with the following parameters:

- reactor coolant average temperature—the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature;
- pressurizer pressure—the Trip Setpoint is varied to correct for changes in system pressure; and
- axial power distribution—the Overtemperature  $\Delta T$  Trip Setpoint is varied to account for imbalances in the axial power distribution as detected by the NIS upper and lower power range detectors. If axial peaks are greater than the design limit, as indicated by the difference between the upper and lower NIS power range detectors, the Trip Setpoint is reduced in accordance with Note 1 of Table 3.3.1-1.

Dynamic compensation is included for system piping delays from the core to the temperature measurement system.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Overtemperature  $\Delta T$  trip Function is calculated for each loop as described in Note 1 of Table 3.3.1-1. A trip occurs if Overtemperature  $\Delta T$  is indicated in two loops. Since the pressure and temperature signals are used for other control functions, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overtemperature  $\Delta T$  condition and may prevent a reactor trip.

The LCO requires all four channels of the Overtemperature  $\Delta T$  trip Function to be OPERABLE. Note that the Overtemperature  $\Delta T$  Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overtemperature  $\Delta T$  trip must be OPERABLE to prevent DNB. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about DNB.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

7. Overpower  $\Delta T$

The Overpower  $\Delta T$  trip Function ensures that protection is provided to ensure the integrity of the fuel (i.e., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions. This trip Function also limits the required range of the Overtemperature  $\Delta T$  trip Function and provides a backup to the Power Range Neutron Flux-High trip. The Overpower  $\Delta T$  trip Function ensures that the allowable heat generation rate (kW/ft) of the fuel is not exceeded. It uses the  $\Delta T$  of each loop as a measure of reactor power with a setpoint that is automatically varied with the following parameters:

- reactor coolant average temperature—the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature; and
- rate of change of reactor coolant average temperature—including dynamic compensation for the delays between the core and the temperature measurement system.

The Overpower  $\Delta T$  trip Function is calculated for each loop as per Note 2 of Table 3.3.1-1. A trip occurs if Overpower  $\Delta T$  is indicated in two loops. Since the temperature signals are used for other control functions, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation and a single failure in the remaining channels providing the protection function actuation. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overpower  $\Delta T$  condition and may prevent a reactor trip.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires four channels of the Overpower  $\Delta T$  trip Function to be OPERABLE. Note that the Overpower  $\Delta T$  trip Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overpower  $\Delta T$  trip Function must be OPERABLE. These are the only times that enough heat is generated in the fuel to be concerned about the heat generation rates and overheating of the fuel. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about fuel overheating and fuel damage.

8. Pressurizer Pressure

The same sensors provide input to the Pressurizer Pressure-High and-Low trips and the Overtemperature  $\Delta T$  trip. Since the Pressurizer Pressure channels are also used to provide input to the Pressurizer Pressure Control System, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation.

a. Pressurizer Pressure-Low

The Pressurizer Pressure-Low trip Function ensures that protection is provided against violating the DNBR limit due to low pressure.

The LCO requires four channels of Pressurizer Pressure-Low to be OPERABLE.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1 or 2, the Pressurizer Pressure-High trip must be OPERABLE to help prevent RCS overpressurization and minimize challenges to the relief and safety valves. In MODE 3, 4, 5, or 6, the Pressurizer Pressure-High trip Function does not have to be OPERABLE because transients that could cause an overpressure condition will be slow to occur. Therefore, the operator will have sufficient time to evaluate unit conditions and take corrective actions. In addition, the Low Temperature Overpressure Protection Systems provide overpressure protection in MODE 4, MODE 5, and in MODE 6 with the reactor vessel head on.

9. Pressurizer Water Level-High

The Pressurizer Water Level-High trip Function provides a backup signal for the Pressurizer Pressure-High trip and also provides protection against water relief through the pressurizer safety valves. These valves are designed to pass steam in order to achieve their design energy removal rate. A reactor trip is actuated prior to the pressurizer becoming water solid. The LCO requires three channels of Pressurizer Water Level-High to be OPERABLE. The channel Allowable Values are specified in percent instrument span. The pressurizer level channels are used as input to the Pressurizer Level Control System. A fourth channel is not required to address control/protection interaction concerns. The level channels do not actuate the safety valves, and the high pressure reactor trip is set below the safety valve setting. Therefore, with the slow rate of charging available, pressure overshoot due to level channel failure cannot cause the safety valve to lift before reactor high pressure trip.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1, when there is a potential for overfilling the pressurizer, the Pressurizer Water Level-High trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-7 interlock. On decreasing power, this trip Function is automatically blocked below P-7. Below the P-7 setpoint, transients that could raise the pressurizer water level will be slow and the operator will have sufficient time to evaluate unit conditions and take corrective actions.

10. Reactor Coolant Flow-Low

The Reactor Coolant Flow-Low Function ensures that protection is provided against violating the DNBR limit due to low flow in the RCS loops, while avoiding reactor trips due to normal variations in loop flow. Each RCS loop has three flow detectors to monitor flow. The flow signals are not used for any control system input.

The LCO requires three Reactor Coolant Flow-Low channels per loop to be OPERABLE in MODE 1 above P-7. Each loop is considered a separate Function. The channel Allowable Values are specified in percent of loop minimum measured flow. The minimum measured flow is 92,850 gpm.

The Reactor Coolant Flow-Low Function encompasses a single loop and a two loop trip logic. In MODE 1 above the P-7 setpoint and below the P-8 setpoint, a loss of flow in two or more loops will initiate a reactor trip. Above the P-8 setpoint, which is approximately 30% RTP, a loss of flow in any one RCS loop will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR. Below the P-7 setpoint, all reactor trips on low flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

11. Reactor Coolant Pump (RCP) Breaker Position

The RCP Breaker Position trip Function operates on four auxiliary contacts per train. Each train is considered a separate Function. This Function anticipates the Reactor Coolant Flow-Low trips to avoid RCS heatup that would occur before the low flow trip actuates.

The RCP Breaker Position trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops. The position of each RCP breaker is monitored. Above the P-7 setpoint, a loss of flow in two or more loops will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low Trip Setpoint is reached.

One OPERABLE channel is sufficient for this Function because the RCS Flow-Low trip alone provides sufficient protection of unit SLs for loss of flow events. The RCP Breaker Position trip serves only to anticipate the low flow trip, minimizing the thermal transient associated with loss of an RCP.

This Function measures only the discrete position (open or closed) of the RCP breaker, using a position switch. Therefore, the Function has no adjustable trip setpoint with which to associate an LSSS.

In MODE 1 above the P-7 setpoint, the RCP Breaker Position trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on loss of flow in two RCS loops is automatically enabled.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

12. Undervoltage Reactor Coolant Pumps

The Undervoltage RCPs reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops. The voltage to each RCP is monitored. Above the P-7 setpoint, a loss of voltage detected on two or more RCP buses will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Two Loops) Trip Setpoint is reached. Time delays are incorporated into the Undervoltage RCPs channels to prevent reactor trips due to momentary electrical power transients.

The LCO requires four Undervoltage RCPs channels to be OPERABLE. There are two undervoltage sensing relays on each 6.9 kV bus which feeds an RCP. One relay provides an input to reactor trip logic Train A and the other relay provides an input to reactor trip logic Train B. Each reactor trip logic train requires input from two of the four buses to initiate a reactor trip. Each train is considered a separate Function.

In MODE 1 above the P-7 setpoint, the Undervoltage RCP trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled. This Function uses the same relays as the Engineered Safety Feature Actuation System (ESFAS) Function 6.e, "Undervoltage Reactor Coolant Pump (RCP)" start of the Auxiliary Feedwater (AF) pumps.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

13. Underfrequency Reactor Coolant Pumps

The Underfrequency RCPs reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS loops from a major network frequency disturbance. An underfrequency condition will slow down the pumps, thereby reducing their coastdown time following a pump trip. The proper coastdown time is required so that reactor heat can be removed immediately after reactor trip. The frequency of each RCP bus is monitored. Above the P-7 setpoint, a loss of frequency detected on two or more RCP buses will initiate a reactor trip. This trip Function will generate a reactor trip before the Reactor Coolant Flow-Low (Two Loops) Trip Setpoint is reached. Time delays are incorporated into the Underfrequency RCPs channels to prevent reactor trips due to momentary electrical power transients.

The LCO requires four Underfrequency RCPs channels to be OPERABLE. There are two underfrequency sensing relays on each 6.9 kV bus which feeds an RCP. One relay provides an input to reactor trip logic Train A and the other relay provides an input to reactor trip logic Train B. Each reactor trip logic train requires input from two of the four buses to initiate a reactor trip. Each train is considered a separate Function.

In MODE 1 above the P-7 setpoint, the Underfrequency RCPs trip must be OPERABLE. Below the P-7 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-7 setpoint, the reactor trip on loss of flow in two or more RCS loops is automatically enabled.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

14. Steam Generator Water Level - Low Low

The SG Water Level - Low Low trip Function ensures that protection is provided against a loss of heat sink and actuates the AF System prior to uncovering the SG tubes. The SGs are the heat sink for the reactor. In order to act as a heat sink, the SGs must contain a minimum amount of water. A narrow range low low level in any SG is indicative of a loss of heat sink for the reactor. The level transmitters provide input to the SG Level Control System. Therefore, the actuation logic must be able to withstand an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. This Function also performs the ESFAS function of starting the AF pumps on low low SG level.

The LCO requires four channels of SG Water Level - Low Low per SG to be OPERABLE in which these channels are shared between protection and control. Each SG is considered a separate Function. The Channel Allowable Values are specified in percent of narrow range instrument span.

In MODE 1 or 2, when the reactor requires a heat sink, the SG Water Level - Low Low trip must be OPERABLE. The normal source of water for the SGs is the Feedwater (FW) System (not safety related). The AF System is the safety related backup source of water to ensure that the SGs remain the heat sink for the reactor. During normal startups and shutdowns, the startup feedwater pump provides feedwater to maintain SG level. In MODE 3, 4, 5, or 6, the SG Water Level - Low Low Function does not have to be OPERABLE because the FW System may not be in operation and the reactor is not operating or critical.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

15. Turbine Trip

a. Turbine Trip—Emergency Trip Header Pressure

The Turbine Trip—Emergency Trip Header Pressure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip. This trip Function acts to minimize the pressure/temperature transient on the reactor. Any turbine trip from a power level below the P-8 setpoint, approximately 30% power, will not actuate a reactor trip. Two trains of three pressure switches monitor the control oil pressure in the Turbine Electrohydraulic Control System. A low pressure condition sensed by two-out-of-three pressure switches in either protection train will actuate a reactor trip. These pressure switches do not provide any input to the control system. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure—High trip Function and RCS integrity is ensured by the pressurizer safety valves.

The LCO requires three channels in each train of Turbine Trip—Emergency Trip Header Pressure to be OPERABLE in MODE 1 above P-8. Each train is considered a separate Function.

Below the P-8 setpoint, a turbine trip does not actuate a reactor trip. In MODE 2, 3, 4, 5, or 6, there is no potential for a turbine trip, and the Turbine Trip—Emergency Trip Header Pressure trip Function does not need to be OPERABLE.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Turbine Trip-Turbine Throttle Valve Closure

The Turbine Trip-Turbine Throttle Valve Closure trip Function anticipates the loss of heat removal capabilities of the secondary system following a turbine trip from a power level above the P-8 setpoint, approximately 30% power. This action will actuate a reactor trip. The trip Function anticipates the loss of secondary heat removal capability that occurs when the throttle valves close. Tripping the reactor in anticipation of loss of secondary heat removal acts to minimize the pressure and temperature transient on the reactor. This trip Function will not and is not required to operate in the presence of a single channel failure. The unit is designed to withstand a complete loss of load and not sustain core damage or challenge the RCS pressure limitations. Core protection is provided by the Pressurizer Pressure-High trip Function, and RCS integrity is ensured by the pressurizer safety valves. This trip Function is diverse to the Turbine Trip-Emergency Trip Header Pressure trip Function. Each turbine throttle valve is equipped with one limit switch that inputs to the RTS. Each limit switch is equipped with two contacts. One contact provides input to reactor trip logic Train A and the other contact provides an input to reactor trip logic Train B. If all four limit switches indicate that the throttle valves are all closed, a reactor trip is initiated.

The LSSS for this Function is set to assure channel trip occurs when the associated throttle valve is completely closed.

The LCO requires four Turbine Trip-Turbine Throttle Valve Closure channels per train, to be OPERABLE in MODE 1 above P-8. All four channels must trip to cause reactor trip.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Below the P-8 setpoint, a load rejection can be accommodated by the Steam Dump System. In MODE 2, 3, 4, 5, or 6, there is no potential for a load rejection, and the Turbine Trip-Turbine Throttle Valve Closure trip Function does not need to be OPERABLE.

16. Safety Injection (SI) Input from Engineered Safety Feature Actuation System

The SI Input from ESFAS ensures that if a reactor trip has not already been generated by the RTS, the ESFAS automatic actuation logic will initiate a reactor trip upon any signal that initiates SI. This is a condition of acceptability for the Loss Of Coolant Accident (LOCA). However, other transients and accidents take credit for varying levels of ESF performance and rely upon rod insertion, except for the most reactive rod that is assumed to be fully withdrawn, to ensure reactor shutdown. Therefore, a reactor trip is initiated every time an SI signal is present.

Allowable Values are not applicable to this Function. The SI Input is provided by relay in the ESFAS. Therefore, there is no measurement signal with which to associate an LSSS.

The LCO requires two trains of SI Input from ESFAS to be OPERABLE in MODE 1 or 2.

A reactor trip is initiated every time an SI signal is present. Therefore, this trip Function must be OPERABLE in MODE 1 or 2, when the reactor is critical, and must be shut down in the event of an accident. In MODE 3, 4, 5, or 6, the reactor is not critical, and this trip Function does not need to be OPERABLE.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

17. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current unit status. They back up operator actions to ensure protection system Functions are not bypassed during unit conditions under which the safety analysis assumes the Functions are not bypassed. Therefore, the interlock Functions do not need to be OPERABLE when the associated reactor trip functions are outside the applicable MODES. These are:

a. Source Range Block Permissive, P-6

The Source Range Block Permissive, P-6 interlock is actuated when any NIS intermediate range channel goes approximately one decade above the minimum channel reading. If both channels drop below the setpoint, the permissive will automatically be defeated. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

- on increasing power, the P-6 interlock allows the manual block of the NIS Source Range, Neutron Flux reactor trip. This prevents a premature block of the source range trip and allows the operator to ensure that the intermediate range is OPERABLE prior to leaving the source range. When the source range trip is blocked, the high voltage to the detectors is also removed; and
- on decreasing power, the P-6 interlock automatically energizes the NIS source range detectors, and enables the NIS Source Range Neutron Flux reactor trip and Boron Dilution Prevention System (BDPS) actuation.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The LCO requires two channels of Source Range Block Permissive, P-6 interlock to be OPERABLE in MODE 2 when below the P-6 interlock setpoint.

Above the P-6 interlock setpoint, the NIS Source Range Neutron Flux reactor trip will be blocked, and this Function will no longer be necessary.

In MODE 3, 4, 5, or 6, the P-6 interlock does not have to be OPERABLE because the NIS Source Range is providing core protection.

b. Low Power Reactor Trips Block, P-7

The Low Power Reactor Trips Block, P-7 interlock is actuated by input from either the Power Range Neutron Flux, P-10, or the Turbine Impulse Pressure, P-13 interlock. The LCO requirement for the P-7 interlock ensures that the following Functions are performed:

(1) on increasing power, the P-7 interlock automatically enables reactor trips on the following Functions:

- Pressurizer Pressure-Low;
- Pressurizer Water Level-High;
- Reactor Coolant Flow-Low (Two Loops);
- Reactor Coolant Pump (RCP) Breaker Position;
- Undervoltage RCPs; and
- Underfrequency RCPs.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

These reactor trips are only required when operating above the P-7 setpoint (approximately 10% power). The reactor trips provide protection against violating the DNBR limit. Below the P-7 setpoint, the RCS is capable of providing sufficient natural circulation without any RCP running.

(2) on decreasing power, the P-7 interlock automatically blocks reactor trips on the following Functions:

- Pressurizer Pressure - Low;
- Pressurizer Water Level - High;
- Reactor Coolant Flow - Low (Two Loops);
- RCP Breaker Position;
- Undervoltage RCPs; and
- Underfrequency RCPs.

Allowable Value are not applicable to the P-7 interlock because it is a logic Function and thus has no parameter with which to associate an LSSS.

The low power trips are blocked below the P-7 setpoint and unblocked above the P-7 setpoint. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the interlock performs its Function when power level drops below approximately 10% power, which is in MODE 1.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

c. Power Range Neutron Flux, P-8

The Power Range Neutron Flux, P-8 interlock is actuated at approximately 30% power as determined by two-out-of-four NIS power range detectors. The P-8 interlock automatically enables the Reactor Coolant Flow-Low (Single Loop) reactor trip on low flow in one or more RCS loops on increasing power. The LCO requirement for this trip Function ensures that protection is provided against a loss of flow in any RCS loop that could result in DNB conditions in the core when greater than approximately 30% power.

The P-8 interlock ensures that the Turbine Trip-Emergency Trip Header Pressure and Turbine Trip-Turbine Throttle Valve Closure reactor trips are enabled above the P-8 setpoint. Above the P-8 setpoint, a turbine trip may cause a load rejection beyond the capacity of the Steam Dump System. A reactor trip is automatically initiated on a turbine trip when it is above the P-8 setpoint, to minimize the transient on the reactor. On decreasing power, the reactor trips on turbine trip and low flow in one loop are automatically blocked.

The LCO requires three channels of Power Range Neutron Flux, P-8 interlock to be OPERABLE in MODE 1.

In MODE 1, a loss of flow in one RCS loop could result in DNB conditions, so the Power Range Neutron Flux, P-8 interlock must be OPERABLE. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the core is not producing sufficient power to be concerned about DNB conditions.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

In MODE 1, a turbine trip could cause a load rejection beyond the capacity of the Steam Dump System, so the Power Range Neutron Flux interlock must be OPERABLE. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at a power level sufficient to have a load rejection beyond the capacity of the Steam Dump System.

d. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock is actuated at approximately 10% power, as determined by two-out-of-four NIS power range detectors. If power level falls below 10% RTP on 3 of 4 channels, the nuclear instrument trips will be automatically unblocked. The LCO requirement for the P-10 interlock ensures that the following Functions are performed:

- on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip. Note that blocking the reactor trip also blocks the signal to prevent automatic and manual rod withdrawal;
- on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux-Low reactor trip;
- on increasing power, the P-10 interlock automatically provides a backup signal to block the Source Range Neutron Flux reactor trip, and also to de-energize the NIS source range detectors;
- the P-10 interlock provides one of the two inputs to the P-7 interlock; and

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

- on decreasing power, the P-10 interlock automatically enables the Power Range Neutron Flux-Low reactor trip and the Intermediate Range Neutron Flux reactor trip (and rod stop).

The LCO requires three channels of Power Range Neutron Flux, P-10 interlock to be OPERABLE in MODE 1 or 2.

OPERABILITY in MODE 1 ensures the Function is available to perform its decreasing power Functions in the event of a reactor shutdown. This Function must be OPERABLE in MODE 2 to ensure that core protection is provided during a startup or shutdown by the Power Range Neutron Flux-Low and Intermediate Range Neutron Flux reactor trips. In MODE 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at power and the Source Range Neutron Flux reactor trip provides core protection.

e. Turbine Impulse Pressure, P-13

The Turbine Impulse Pressure, P-13 interlock is actuated when the pressure in the first stage of the high pressure turbine is greater than approximately 10% of the rated full power pressure. This is determined by one-out-of-two pressure detectors. The LCO requirement for this Function provides one of the two inputs to the P-7 interlock.

The LCO requires two channels of Turbine Impulse Pressure, P-13 interlock to be OPERABLE in MODE 1.

The Turbine Impulse Chamber Pressure, P-13 interlock must be OPERABLE when the turbine generator is operating. The interlock Function is not required OPERABLE in MODE 2, 3, 4, 5, or 6 because the turbine generator is not operating.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

18. Reactor Trip Breakers

This trip Function applies to the RTBs exclusive of individual trip mechanisms. The LCO requires two OPERABLE trains of trip breakers. A trip breaker train consists of all trip breakers associated with a single RTS logic train that are racked in, closed, and capable of supplying power to the Rod Control System. Two OPERABLE trains ensure no single random failure can disable the RTS trip capability.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

19. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms

The LCO requires both the Undervoltage and Shunt Trip Mechanisms to be OPERABLE for each RTB that is in service. The trip mechanisms are not required to be OPERABLE for trip breakers that are open, racked out, incapable of supplying power to the Rod Control System, or declared inoperable under Function 18 above. OPERABILITY of both trip mechanisms on each breaker ensures that no single trip mechanism failure will prevent opening any breaker on a valid signal.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

20. Automatic Trip Logic

The LCO requirement for the RTBs (Functions 18 and 19) and Automatic Trip Logic (Function 20) ensures that means are provided to interrupt the power to allow the rods to fall into the reactor core. Each RTB is equipped with an undervoltage coil and a shunt trip coil to trip the breaker open when needed. Each RTB is equipped with a bypass breaker to allow testing of the trip breaker while the unit is at power. The reactor trip signals generated by the RTS Automatic Trip Logic cause the RTBs and associated bypass breakers to open and shut down the reactor.

The LCO requires two trains of RTS Automatic Trip Logic to be OPERABLE. Having two OPERABLE trains ensures that random failure of a single logic train will not prevent reactor trip.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

The RTS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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ACTIONS

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.1-1.

In the event a channel's Trip Setpoint is found nonconservative with respect to the Allowable Value, or the transmitter, instrument loop, signal processing electronics, or bistable is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO Condition(s) entered for the protection Function(s) affected.

BASES

ACTIONS (continued)

When the number of inoperable channels in a trip Function exceed those specified in all related Conditions associated with a trip Function, then the unit is outside the safety analysis. Therefore, LCO 3.0.3 must be immediately entered if applicable in the current MODE of operation.

A.1

Condition A applies to all RTS protection Functions. Condition A addresses the situation where one or more required channels or trains for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.1-1 and to take the Required Actions for the protection functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

B.1 and B.2

Condition B applies to the Manual Reactor Trip in MODE 1 or 2. This action addresses the train orientation of the SSPS for this Function. With one channel inoperable, the inoperable channel must be restored to OPERABLE status within 48 hours. In this Condition, the remaining OPERABLE channel is adequate to perform the safety function.

The Completion Time of 48 hours is reasonable considering that there are two automatic actuation trains and another manual initiation channel OPERABLE, and the low probability of an event occurring during this interval.

If the Manual Reactor Trip Function cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 additional hours (54 hours total time). The 6 additional hours to reach MODE 3 is reasonable, based on operating experience, to reach MODE 3 from full power operation in an orderly manner and without challenging plant systems. With the unit in MODE 3, Action C would apply to any inoperable Manual Reactor Trip Function if the Rod Control System is capable of rod withdrawal or one or more rods are not fully inserted.

BASES

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ACTIONS (continued)

C.1 and C.2

Condition C applies to the following reactor trip Functions in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods are not fully inserted:

- Manual Reactor Trip;
- RTBs;
- RTB Undervoltage and Shunt Trip Mechanisms; and
- Automatic Trip Logic.

This action addresses the train orientation of the SSPS for these Functions. With one channel or train inoperable, the inoperable channel or train must be restored to OPERABLE status within 48 hours. If the affected Function(s) cannot be restored to OPERABLE status within the allowed 48 hour Completion Time, the unit must be placed in a MODE in which the requirement does not apply. To achieve this status, the action must be initiated within the same 48 hours to ensure that all rods are fully inserted, and the Rod Control System must be placed in a condition incapable of rod withdrawal within the next hour. The additional hour provides sufficient time to accomplish the action in an orderly manner. With rods fully inserted and the Rod Control System incapable of rod withdrawal, these Functions are no longer required.

The Completion Time is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function, and given the low probability of an event occurring during this interval.



BASES

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ACTIONS (continued)

A Note to the ACTIONS restricts the transition from MODE 5 with the Rod Control System not capable of rod withdrawal and all rods fully inserted, to MODE 5 with the Rod Control System capable of rod withdrawal or all rods not fully inserted for Functions 18, 19, and 20 while complying with the ACTIONS (i.e., while the LCO is not met). LCO 3.0.4 typically allows entry into MODES or other specified conditions in the Applicability while in MODE 5, however, the restriction of this Note is necessary to assure an OPERABLE RTS function prior to commencing operation with the Rod Control System capable of rod withdrawal or all rods not fully inserted.

D.1.1, D.1.2, D.2.1, D.2.2, and D.3

Condition D applies to the Power Range Neutron Flux-High Function.

The NIS power range detectors provide input to the Rod Control System and the SG Water Level Control System and, therefore, have a two-out-of-four trip logic. A known inoperable channel must be placed in the tripped condition. This results in a partial trip condition requiring only one-out-of-three logic for actuation. The 6 hours allowed to place the inoperable channel in the tripped condition is justified in WCAP-10271-P-A (Ref. 7).

In addition to placing the inoperable channel in the tripped condition, THERMAL POWER must be reduced to  $\leq 75\%$  RTP within 12 hours. Reducing the power level prevents operation of the core with radial power distributions beyond the design limits. With one of the NIS power range detectors inoperable, 1/4 of the radial power distribution monitoring capability may be lost.

BASES

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ACTIONS (continued)

As an alternative to the above actions, the inoperable channel can be placed in the tripped condition within 6 hours and the QPTR monitored once every 12 hours as per SR 3.2.4.2, QPTR verification. Calculating QPTR every 12 hours compensates for the potential lost monitoring capability due to the inoperable NIS power range channel and allows continued unit operation at power levels  $\geq 75\%$  RTP. The 6 hour Completion Time and the 12 hour Frequency are consistent with LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

As an alternative to the above Actions, the plant must be placed in a MODE where this Function is no longer required OPERABLE. Twelve hours are allowed to place the plant in MODE 3. This is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. If Required Actions cannot be completed within their allowed Completion Times, LCO 3.0.3 must be entered.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypass condition for up to 4 hours while performing routine surveillance testing of other channels. The Note also allows placing the inoperable channel in the bypass condition to allow setpoint adjustments of other channels when required to reduce the setpoint in accordance with other Technical Specifications. The 4 hour time limit is justified in Reference 7.

Required Action D.2.2 has been modified by a Note which only requires SR 3.2.4.2 to be performed if the Power Range Neutron Flux input to QPTR becomes inoperable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. As such, determining QPTR using this movable incore detectors once per 12 hours may not be necessary.

BASES

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ACTIONS (continued)

E.1 and E.2

Condition E applies to the following reactor trip Functions:

- Power Range Neutron Flux—Low;
- Overtemperature  $\Delta T$ ;
- Overpower  $\Delta T$ ;
- Power Range Neutron Flux—High Positive Rate;
- Power Range Neutron Flux—High Negative Rate;
- Pressurizer Pressure—High; and
- SG Water Level—Low Low.

A known inoperable channel must be placed in the tripped condition within 6 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one-out-of-three logic for actuation of the two-out-of-four trips. The 6 hours allowed to place the inoperable channel in the tripped condition is justified in Reference 7.

If the operable channel cannot be placed in the trip condition within the specified Completion Time, the unit must be placed in a MODE where these Functions are not required OPERABLE. An additional 6 hours is allowed to place the unit in MODE 3. Six hours is a reasonable time, based on operating experience, to place the unit in MODE 3 from full power in an orderly manner and without challenging plant systems.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 7.

BASES

ACTIONS (continued)

F.1 and F.2

Condition F applies to the Intermediate Range Neutron Flux trip when THERMAL POWER is above the P-6 setpoint and below the P-10 setpoint and one channel is inoperable. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range detector performs the monitoring Functions. If THERMAL POWER is greater than the P-6 setpoint but less than the P-10 setpoint, 2 hours is allowed to reduce THERMAL POWER below the P-6 setpoint or increase to THERMAL POWER above the P-10 setpoint. The provisions of LCO 3.0.4 allow entry into a MODE or other specified condition in the Applicability as directed by the Required Actions. Therefore, a MODE change is permitted with one channel inoperable whenever Required Action F.2 is used. The NIS Intermediate Range Neutron Flux channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10. If THERMAL POWER is greater than the P-10 setpoint, the NIS power range detectors perform the monitoring and protection functions and the intermediate range is not required. The Completion Times allow for a slow and controlled power adjustment above P-10 or below P-6 and take into account the redundant capability afforded by the redundant OPERABLE channel, and the low probability of its failure during this period. This action does not require the inoperable channel to be tripped because the Function uses one-out-of-two logic. Tripping one channel would trip the reactor. Thus, the Required Actions specified in this Condition are only applicable when channel failure does not result in reactor trip.

## BASES

### ACTIONS (continued)

#### G.1 and G.2

Condition G applies to two inoperable Intermediate Range Neutron Flux trip channels in MODE 2 when THERMAL POWER is above the P-6 setpoint and below the P-10 setpoint. Required Actions specified in this Condition are only applicable when channel failures do not result in reactor trip. Above the P-6 setpoint and below the P-10 setpoint, the NIS intermediate range detector performs the monitoring Functions. With no intermediate range channels OPERABLE, the Required Actions are to suspend operations involving positive reactivity additions immediately. This will preclude any power level increase since there are no OPERABLE Intermediate Range Neutron Flux channels. The operator must also reduce THERMAL POWER below the P-6 setpoint within two hours. Below P-6, the Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of 2 hours will allow a slow and controlled power reduction to less than the P-6 setpoint and takes into account the low probability of occurrence of an event during this period that may require the protection afforded by the NIS Intermediate Range Neutron Flux trip.

#### H.1

Condition H applies to one inoperable Source Range Neutron Flux trip channel when in MODE 2, below the P-6 setpoint. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the two channels inoperable, operations involving positive reactivity additions shall be suspended immediately.

This will preclude any power escalation. With only one source range channel OPERABLE, core protection is severely reduced and any actions that add positive reactivity to the core must be suspended immediately.

BASES

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ACTIONS (continued)

I.1

Condition I applies to two inoperable Source Range Neutron Flux trip channels when in MODE 2, below the P-6 setpoint, and in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With both source range channels inoperable, the RTBs must be opened immediately. With the RTBs open, the core is in a more stable condition.

J.1 and J.2

Condition J applies to one inoperable source range channel in MODE 3, 4, or 5 with the Rod Control System capable of rod withdrawal or one or more rods not fully inserted. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one of the source range channels inoperable, 48 hours is allowed to restore it to an OPERABLE status. If the channel cannot be returned to an OPERABLE status, action must be initiated within the same 48 hours to ensure that all rods are fully inserted, and the Rod Control System must be placed in a condition incapable of rod withdrawal within the next hour. The allowance of 48 hours to restore the channel to OPERABLE status, and the additional hour, are justified in Reference 7.

BASES

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ACTIONS (continued)

K.1 and K.2

Condition K applies to the following reactor trip Functions:

- Pressurizer Pressure-Low;
- Pressurizer Water Level-High;
- Reactor Coolant Flow-Low;
- RCP Breaker Position;
- Undervoltage RCPs; and
- Underfrequency RCPs.

With one channel inoperable, the inoperable channel must be placed in the tripped condition within 6 hours. Placing the channel in the tripped condition results in a partial trip condition requiring only one additional channel to initiate a reactor trip above the P-7 setpoint. These Functions do not have to be OPERABLE below the P-7 setpoint. The 6 hours allowed to place the channel in the tripped condition is justified in Reference 7. An additional 6 hours is allowed to reduce THERMAL POWER to below P-7 if the inoperable channel cannot be restored to OPERABLE status or placed in trip within the specified Completion Time.

Allowance of this time interval takes into consideration the redundant capability provided by the remaining redundant OPERABLE channel, and the low probability of occurrence of an event during this period that may require the protection afforded by the Functions associated with Condition K.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 7.

BASES

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ACTIONS (continued)

L.1 and L.2

Condition L applies to Turbine Trip on Emergency Trip Header Pressure or on Turbine Throttle Valve Closure. With one channel inoperable, the inoperable channel must be placed in the trip condition within 6 hours. If placed in the tripped condition, this results in a partial trip condition requiring only one additional channel to initiate a reactor trip. If the channel cannot be restored to OPERABLE status or placed in the trip condition, then power must be reduced below the P-8 setpoint within the next 6 hours. The 6 hours allowed to place the inoperable channel in the tripped condition is justified in Reference 7.

The Required Actions have been modified by a Note that allows placing the inoperable channel in the bypassed condition for up to 4 hours while performing routine surveillance testing of the other channels. The 4 hour time limit is justified in Reference 7.

M.1 and M.2

Condition M applies to the SI Input from ESFAS reactor trip and the RTS Automatic Trip Logic in MODES 1 and 2. These actions address the train orientation of the RTS for these Functions. With one train inoperable, 6 hours are allowed to restore the train to OPERABLE status (Required Action M.1) or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 6 hours (Required Action M.1) is reasonable considering that in this Condition, the remaining OPERABLE train is adequate to perform the safety function and given the low probability of an event during this interval. The Completion Time of 6 hours (Required Action M.2) is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

The Required Actions have been modified by a Note that allows bypassing one train up to 4 hours for surveillance testing, provided the other train is OPERABLE.



BASES

ACTIONS (continued)

N.1 and N.2

Condition N applies to the RTBs in MODES 1 and 2. These actions address the train orientation of the RTS for the RTBs. With one train inoperable, 1 hour is allowed to restore the train to OPERABLE status or the unit must be placed in MODE 3 within the next 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. The 1 hour and 6 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function. Placing the unit in MODE 3 results in Action C entry while RTB(s) are inoperable.

The Required Actions have been modified by two Notes. Note 1 allows one channel to be bypassed for up to 2 hours for surveillance testing, provided the other channel is OPERABLE. Note 2 allows one RTB to be bypassed for up to 2 hours for maintenance on undervoltage or shunt trip mechanisms if the other RTB train is OPERABLE. The 2 hour time limit is justified in Reference 7.

O.1 and O.2

Condition O applies to the P-6 and P-10 interlocks. With one or more channels inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition by observation of the associated permissive annunciator window within 1 hour or the unit must be placed in MODE 3 within the next 6 hours. Verifying the interlock status manually accomplishes the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. The 1 hour and 6 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function.

BASES

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ACTIONS (continued)

P.1 and P.2

Condition P applies to the P-7, P-8, and P-13 interlocks. With one or more channels inoperable for one-out-of-two or two-out-of-four coincidence logic, the associated interlock must be verified to be in its required state for the existing unit condition by observation of the associated permissive annunciator window within 1 hour or the unit must be placed in MODE 2 within the next 6 hours. These actions are conservative for the case where power level is being raised. Verifying the interlock status manually accomplishes the interlock's Function. The Completion Time of 1 hour is based on operating experience and the minimum amount of time allowed for manual operator actions. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power in an orderly manner and without challenging plant systems.

Q.1 and Q.2

Condition Q applies to the RTB Undervoltage and Shunt Trip Mechanisms, or diverse trip features, in MODES 1 and 2. With one of the diverse trip features inoperable, it must be restored to an OPERABLE status within 48 hours or the unit must be placed in a MODE where the requirement does not apply. This is accomplished by placing the unit in MODE 3 within the next 6 hours (54 hours total time). The Completion Time of 6 hours is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

With the unit in MODE 3, Action C would apply to any inoperable RTB trip mechanism. The affected RTB shall not be bypassed while one of the diverse features is inoperable except for the time required to perform maintenance to one of the diverse features. The allowable time for performing maintenance of the diverse features is 2 hours for the reasons stated under Condition N.

BASES

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ACTIONS (continued)

The Completion Time of 48 hours for Required Action Q.1 is reasonable considering that in this Condition there is one remaining diverse feature for the affected RTB, and one OPERABLE RTB capable of performing the safety function and given the low probability of an event occurring during this interval.

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SURVEILLANCE  
REQUIREMENTS

The SRs for each RTS Function are identified by the SRs column of Table 3.3.1-1 for that Function.

A Note has been added to the SR Table stating that Table 3.3.1-1 determines which SRs apply to which RTS Functions.

Note that each channel of process protection supplies both trains of the RTS. When testing Channel I, Train A and Train B must be examined. Similarly, Train A and Train B must be examined when testing Channel II, Channel III, and Channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

SR 3.3.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.1.2

SR 3.3.1.2 compares the calorimetric heat balance calculation to the NIS channel output every 24 hours. If the calorimetric exceeds the NIS channel output by  $> 2\%$  RTP, the NIS is not declared inoperable, but must be adjusted. If the NIS channel output cannot be properly adjusted, the channel is declared inoperable.

Two Notes modify SR 3.3.1.2. The first Note indicates that the NIS channel output shall be adjusted consistent with the calorimetric results if the absolute difference between the NIS channel output and the calorimetric is  $> 2\%$  RTP. The second Note clarifies that this Surveillance is required only if reactor power is  $\geq 15\%$  RTP and that 12 hours is allowed for performing the first Surveillance after reaching 15% RTP. At lower power levels, calorimetric data are inaccurate.

The Frequency of every 24 hours is adequate. It is based on plant operating experience, considering instrument reliability and operating history data for instrument drift. Together these factors demonstrate the change in the absolute difference between NIS and heat balance calculated powers rarely exceeds 2% in any 24 hour period.

In addition, control room operators periodically monitor redundant indications and alarms to detect deviations in channel outputs.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.3

SR 3.3.1.3 compares the incore system to the NIS channel output prior to exceeding 75% RTP after each refueling and every 31 Effective Full Power days (EFPD) thereafter. If the absolute difference is  $\geq 3\%$ , the NIS channel is still OPERABLE, but must be readjusted.

If the NIS channel cannot be properly readjusted, the channel is declared inoperable. This Surveillance is performed to verify the  $f(\Delta I)$  input to the Overtemperature  $\Delta T$  Function.

Two Notes modify SR 3.3.1.3. Note 1 indicates that the excore NIS channel shall be adjusted if the absolute difference between the incore and excore AFD is  $\geq 3\%$ . Note 2 clarifies that the Surveillance is required only if reactor power is  $> 15\%$  RTP.

The Frequency of once prior to exceeding 75% RTP following each refueling outage considers that the core may be changed during a refueling outage such that the previous comparison, prior to the refueling outage, is no longer completely valid. The Frequency also considers that the comparison accuracy increases with power level such that the comparison is preferred to be performed at as high a power level as possible. An initial performance at  $\leq 75\%$  RTP provides a verification prior to attaining full power.

The Frequency of every 31 EFPD is adequate. It is based on plant operating experience, considering instrument reliability and operating history data for instrument drift. Also, the slow changes in neutron flux during the fuel cycle can be detected during this interval.

SR 3.3.1.4

SR 3.3.1.4 is the performance of a TADOT every 31 days on a STAGGERED TEST BASIS. This test shall verify OPERABILITY by actuation of the end devices.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The RTB test shall include separate verification of the undervoltage and shunt trip mechanisms. Independent verification of RTB undervoltage and shunt trip function is not required for the bypass breakers. No capability is provided for performing such a test at power. The independent test for bypass breakers is included in SR 3.3.1.13. The bypass breaker test shall include a local shunt trip. A Note has been added to indicate that this test must be performed on the bypass breaker prior to placing it in service.

The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.1.5

SR 3.3.1.5 is the performance of an ACTUATION LOGIC TEST. The SSPS is tested every 31 days on a STAGGERED TEST BASIS, using the semiautomatic tester. The train being tested is placed in the bypass condition, thus preventing inadvertent actuation. Through the semiautomatic tester, all possible logic combinations, with and without applicable permissives, are tested for each protection function. The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.1.6

SR 3.3.1.6 is a calibration of the excore channels to the incore channels. If the measurements do not agree, the excore channels are not declared inoperable but must be calibrated to agree with the incore detector measurements. If the excore channels cannot be adjusted, the channels are declared inoperable. This Surveillance is performed to verify the  $f(\Delta I)$  input to the Overtemperature  $\Delta T$  Function.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

A Note modifies SR 3.3.1.6. The Note states that this Surveillance is required only if reactor power is  $\geq 75\%$  RTP and that 24 hours is allowed for performing the first surveillance after reaching 75% RTP.

The Frequency of 92 EFPD is adequate. It is based on industry operating experience, considering instrument reliability and operating history data for instrument drift.

SR 3.3.1.7

SR 3.3.1.7 is the performance of a COT every 92 days. A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be within the Allowable Values specified in Table 3.3.1-1.

The difference between the current "as found" values and the previous test "as left" values must be consistent with the calculated normal uncertainties consistent with the setpoint methodology. The setpoint shall be left set consistent with the assumptions of the current plant specific setpoint methodology.

The "as found" and "as left" values must also be recorded and reviewed for consistency with the assumptions of the surveillance interval extension analysis (Ref. 7) when applicable.

SR 3.3.1.7 is modified by a Note that provides a 4 hour delay in the requirement to perform this Surveillance for source range instrumentation when entering MODE 3 from MODE 2. This Note allows a normal shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3 until the RTBs are open and SR 3.3.1.7 is no longer required to be performed. If the unit is to be in MODE 3 with the RTBs closed for  $> 4$  hours, this Surveillance must be performed prior to 4 hours after entry into MODE 3.

The Frequency of 92 days is justified in Reference 7.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.8

SR 3.3.1.8 is the performance of a COT as described in SR 3.3.1.7, except it is modified by a Note that this test shall include verification that the P-6 and P-10 interlocks are in their required state for the existing unit condition. The Frequency is modified by a Note that allows this surveillance to be satisfied if it has been performed within 92 days of the Frequencies prior to reactor startup and four hours after reducing power below P-10 and P-6. The Frequency of "prior to startup" ensures this surveillance is performed prior to critical operations and applies to the source, intermediate and power range low instrument channels. The Frequency of "4 hours after reducing power below P-10" (applicable to intermediate and power range low channels) and "4 hours after reducing power below P-6" (applicable to source range channels) allows a normal shutdown to be completed and the unit removed from the MODE of Applicability for this surveillance without a delay to perform the testing required by this surveillance. The Frequency of every 92 days thereafter applies if the unit remains in the MODE of Applicability after the initial performances of prior to reactor startup and four hours after reducing power below P-10 or P-6. The MODE of Applicability for this surveillance is < P-10 for the power range low and intermediate range channels and < P-6 for the source range channels. Once the unit is in MODE 3, this surveillance is no longer required. If power is to be maintained < P-10 or < P-6 for more than 4 hours, then the testing required by this surveillance must be performed prior to the expiration of the 4 hour limit. Four hours is a reasonable time to complete the required testing or place the unit in a MODE where this surveillance is no longer required. This test ensures that the NIS source, intermediate, and power range low channels are OPERABLE prior to taking the reactor critical and after reducing power into the applicable MODE (< P-10 or < P-6) for periods > 4 hours.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.9

SR 3.3.1.9 is the performance of a TADOT every 92 days, as justified in Reference 7.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. Since this SR applies to RCP undervoltage and underfrequency relays, setpoint verification requires elaborate bench calibration and is accomplished during the CHANNEL CALIBRATION.

SR 3.3.1.10

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the plant specific setpoint methodology. The difference between the current "as found" values and the previous test "as left" values must be consistent with the calculated normal uncertainties consistent with the setpoint methodology.

The Frequency of 18 months is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

SR 3.3.1.10 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.11

SR 3.3.1.11 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the power range neutron detectors consists of a normalization of the detectors based on a power calorimetric and flux map performed above 15% RTP, and obtaining detector plateau curves, evaluating those curves, and comparing the curves to the manufacturer's data. The CHANNEL CALIBRATION for the source range, intermediate range, and power range neutron detectors consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. This Surveillance is not required for the NIS power range detectors for entry into MODE 2 or 1, and is not required for the NIS intermediate range detectors for entry into MODE 2, because the unit must be in at least MODE 2 to perform the test for the intermediate range detectors and MODE 1 for the power range detectors. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed on the 18 month Frequency.

SR 3.3.1.12

SR 3.3.1.12 is the performance of a COT of RTS interlocks every 18 months.

The Frequency is based on the known reliability of the interlocks and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.13

SR 3.3.1.13 is the performance of a TADOT of the Manual Reactor Trip, RCP Breaker Position, and the SI Input from ESFAS. This TADOT is performed every 18 months. The test shall independently verify the OPERABILITY of the Undervoltage and Shunt Trip Mechanisms for the Manual Reactor Trip Function for the Reactor Trip Breakers and Reactor Trip Bypass Breakers. The Reactor Trip Bypass Breaker test shall include testing of the automatic undervoltage trip.

The Frequency is based on the known reliability of the Functions and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

The SR is modified by a Note that excludes verification of setpoints from the TADOT. The Functions affected have no setpoints associated with them.

SR 3.3.1.14

SR 3.3.1.14 is the performance of a TADOT of Turbine Trip Functions. This TADOT is performed prior to reactor startup. A Note states that this Surveillance is required if it has not been performed once within the previous 31 days. Verification of the Trip Setpoint does not have to be performed for this Surveillance. Performance of this test will ensure that the Turbine Trip Function is OPERABLE prior to taking the reactor critical. This test cannot be performed with the reactor at power and must therefore be performed prior to reactor startup.

SR 3.3.1.15

SR 3.3.1.15 verifies that the individual channel/train actuation response times are less than or equal to the maximum values assumed in the accident analysis. Response time testing acceptance criteria are included in the UFSAR, Section 7.2 (Ref. 9). Individual component response times are not modeled in the analyses.

## BASES

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### SURVEILLANCE REQUIREMENTS (continued)

The analyses model the overall or total elapsed time, from the point at which the parameter exceeds the trip setpoint value at the sensor to the point at which the equipment reaches the required functional state.

For channels that include dynamic transfer Functions (e.g., lag, lead/lag, rate/lag, etc.), the response time test may be performed with the transfer Function set to one, with the resulting measured response time compared to the appropriate UFSAR response time. Alternately, the response time test can be performed with the time constants set to their nominal value, provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured.

Response time may be verified by actual response time tests in any series of sequential, overlapping or total channel measurements, or by the summation of allocated sensor, signal processing, and actuation logic response times with actual response time tests on the remainder of the channel. Allocations for sensor response times may be obtained from: (1) historical records based on acceptable response time tests (hydraulic, noise, or power interrupt tests), (2) in-place, onsite, or offsite (e.g., vendor) test measurements, or (3) utilizing vendor engineering specifications. Reference 8 provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors identified in the WCAP. Response time verification for other sensor types must be demonstrated by test.

The allocations for sensor response times must be verified prior to placing the component in operational service and re-verified following maintenance that may adversely affect response time. In general, electrical repair work does not impact response time provided the parts used for repair are of the same type and value. One example where response time could be affected is replacing the sensing assembly of a transmitter.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

As appropriate, each channel's response must be verified every 18 months on a STAGGERED TEST BASIS. Testing of the final actuation devices is included in the testing. Response times cannot be determined during unit operation because equipment operation is required to measure response times. Experience has shown that these components usually pass this surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.3.1.15 is modified by a Note stating that neutron detectors are excluded from RTS RESPONSE TIME testing. This Note is necessary because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation ensure a virtually instantaneous response.

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REFERENCES

1. UFSAR, Chapter 7.
2. UFSAR, Chapter 6.
3. UFSAR, Chapter 15.
4. IEEE-279-1971.
5. Technical Requirements Manual.
6. WCAP-12523, "RTS/ESFAS Setpoint Methodology Study," October 1990.
7. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.
8. WCAP-13632, Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements," August 1995.
9. UFSAR, Section 7.2.

## B 3.3 INSTRUMENTATION

### B 3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

#### BASES

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#### BACKGROUND

The ESFAS initiates necessary safety systems, based on the values of selected unit parameters, to protect against violating core design limits and the Reactor Coolant System (RCS) pressure boundary, and to mitigate accidents.

The ESFAS instrumentation is segmented into three distinct but interconnected modules as identified below:

- Field transmitters or process sensors and instrumentation: provide a measurable electronic signal based on the physical characteristics of the parameter being measured;
- Signal processing equipment including analog protection system, field contacts, and protection channel sets: provide signal conditioning, bistable setpoint comparison, process algorithm actuation, compatible electrical signal output to protection system devices, and control board/control room/miscellaneous indications; and
- Solid State Protection System (SSPS) including input, logic, and output bays: initiates the proper unit shutdown or Engineered Safety Feature (ESF) actuation in accordance with the defined logic and based on the bistable outputs from the signal process control and protection system.

## BASES

### BACKGROUND (continued)

#### Field Transmitters or Sensors

To meet the design demands for redundancy and reliability, more than one, and often as many as four, field transmitters or sensors are used to measure unit parameters. In many cases, field transmitters or sensors that input to the ESFAS are shared with the Reactor Trip System (RTS). In some cases, the same channels also provide control system inputs. To account for calibration tolerances and instrument drift, which are assumed to occur between calibrations, statistical allowances are provided in the Trip Setpoint and Allowable Values. The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against its documented acceptance criteria.

#### Signal Processing Equipment

Generally, three or four channels of process control equipment are used for the signal processing of unit parameters measured by the field instruments. The process control equipment provides signal conditioning, comparable output signals for instruments located on the main control board, and comparison of measured input signals with established setpoints. If the measured value of a unit parameter exceeds the predetermined setpoint, an output from a bistable is forwarded to the SSPS for decision evaluation. Channel separation is maintained up to and through the input bays. However, not all unit parameters require four channels of sensor measurement and signal processing. Some unit parameters provide input only to the SSPS, while others provide input to the SSPS, the main control board, the plant computer, and one or more control systems.

## BASES

### BACKGROUND (continued)

Generally, if a parameter is used only for input to the protection circuits, three channels with a two-out-of-three logic are sufficient to provide the required reliability and redundancy. If one channel fails in a direction that would not result in a partial Function trip, the Function is still OPERABLE with a two-out-of-two logic. If one channel fails, such that a partial Function trip occurs, a trip will not occur and the Function is still OPERABLE with a one-out-of-two logic.

Generally, if a parameter is used for input to the SSPS and a control function, four channels with a two-out-of-four logic are sufficient to provide the required reliability and redundancy. The circuit must be able to withstand both an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Again, a single failure will neither cause nor prevent the protection function actuation.

These requirements are described in IEEE-279-1971 (Ref. 4). The actual number of channels required for each unit parameter is specified in Reference 2.

#### Trip Setpoints and Allowable Values

Allowable Values provide a conservative margin with regards to instrument uncertainties to ensure that Safety Limits (SLs) are not violated during Anticipated Operational Occurrences (AOOs) and that the consequences of Design Basis Accidents (DBAs) will be acceptable providing the unit is operated from within the LCOs at the onset of the event and required equipment functions as designed. If the measured value of a bistable/contact is less conservative than the Allowable Value, then the associated ESFAS function is considered inoperable. Allowable Values for ESFAS functions are specified in Table 3.3.2-1.



## BASES

### BACKGROUND (continued)

Trip Setpoints are the nominal values at which the bistables or setpoint comparators are set. The actual nominal Trip Setpoint entered into the bistable/comparator is more conservative than that specified by the Allowable Value to account for changes in measurement errors detectable by a CHANNEL OPERATIONAL TEST (COT). One example of such a change in measurement error is attributable to calculated normal uncertainties during the surveillance interval. Any bistable is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION tolerance. If the measured value of a bistable is less conservative than the Trip Setpoint, but is within the Allowable Value, then the associated ESFAS Function is considered OPERABLE. Trip Setpoints are specified in the Technical Requirements Manual (Ref. 5).

Allowable Values and Trip Setpoints are based on a methodology which incorporates all of the known uncertainties applicable for each instrument channel. A detailed description of the methodology used to calculate the Allowable Values and Trip Setpoints, including their explicit uncertainties, is provided in Reference 6.

### Solid State Protection System

The SSPS equipment is used for the decision logic processing of outputs from the signal processing equipment bistables. To meet the redundancy requirements, two trains of SSPS, each performing the same functions, are provided. If one train is taken out of service for maintenance or test purposes, the second train will provide ESF actuation for the unit. If both trains are taken out of service or placed in test, a reactor trip will result. Each train is packaged in its own cabinet for physical and electrical separation to satisfy separation and independence requirements.

The SSPS performs the decision logic for most ESF equipment actuation; generates the electrical output signals that initiate the required actuation; and provides the status, permissive, and annunciator output signals to the main control room.

## BASES

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### BACKGROUND (continued)

The bistable outputs from the signal processing equipment are sensed by the SSPS equipment and combined into logic matrices that represent combinations indicative of various transients. If a required logic matrix combination is completed, the system will send actuation signals via master and slave relays to those components whose aggregate Function best serves to alleviate the condition and restore the unit to a safe condition. Examples are given in the Applicable Safety Analyses, LCO, and Applicability sections of this Bases.

Each SSPS train has a built in testing device that can automatically test the decision logic matrix functions and the actuation devices while the unit is at power. When any one train is taken out of service for testing, the other train is capable of providing unit monitoring and protection until the testing has been completed. The testing device is semiautomatic to minimize testing time.

The actuation of ESF components is accomplished through master and slave relays. The SSPS energizes the master relays appropriate for the condition of the unit. Each master relay then energizes one or more slave relays, which then cause actuation of the end devices. The master and slave relays are routinely tested to ensure operation. The test of the master relays energizes the relay, which then operates the contacts and applies a low voltage to the associated slave relays. The low voltage is not sufficient to actuate the slave relays but only demonstrates signal path continuity. The SLAVE RELAY TEST actuates the devices if their operation will not interfere with continued unit operation. For the latter case, actual component operation is prevented by the SLAVE RELAY TEST circuit, and slave relay contact operation is verified by a continuity check of the circuit containing the slave relay.

## BASES

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### APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

Each of the analyzed accidents can be detected by one or more ESFAS Functions. One of the ESFAS Functions is the primary actuation signal for that accident. An ESFAS Function may be the primary actuation signal for more than one type of accident. An ESFAS Function may also be a secondary, or backup, actuation signal for one or more other accidents. For example, Pressurizer Pressure-Low is a primary actuation signal for small Loss Of Coolant Accidents (LOCAs) and a backup actuation signal for Steam Line Breaks (SLBs) outside containment. Functions such as manual initiation, not specifically credited in the accident safety analysis, are qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the unit. These Functions may provide protection for conditions that do not require dynamic transient analysis to demonstrate Function performance. These Functions may also serve as backups to Functions that were credited in the accident analysis (Ref. 3).

The LCO requires all instrumentation performing an ESFAS Function to be OPERABLE when the unit status is within the Applicability. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of three or four channels in each instrumentation Function and two channels in each logic and manual initiation Function. The two-out-of-three and the two-out-of-four configurations allow one channel to be tripped during maintenance or testing without causing an ESFAS initiation. Two logic or manual initiation channels are required to ensure no single random failure disables the ESFAS.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The required channels of ESFAS instrumentation provide unit protection in the event of any of the analyzed accidents. ESFAS protection functions are as follows:

1. Safety Injection

Safety Injection (SI) provides two primary functions:

1. Primary side water addition to ensure maintenance or recovery of reactor vessel water level (coverage of the active fuel for heat removal, clad integrity, and for limiting peak clad temperature to  $< 2200^{\circ}\text{F}$ ); and
2. Boration to ensure recovery and maintenance of SDM.

These functions are necessary to mitigate the effects of High Energy Line Breaks (HELBs) both inside and outside of containment. The SI signal is also used to initiate other Functions such as:

- Phase A Isolation;
- Containment Purge Isolation;
- Reactor Trip;
- Turbine Trip;
- Feedwater Isolation;
- Start of Auxiliary Feedwater (AF) pumps;
- Control room ventilation isolation; and
- Enabling automatic switchover of Emergency Core Cooling Systems (ECCS) pump suction to containment sump.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

These other functions ensure:

- Isolation of nonessential systems through containment penetrations;
- Trip of the turbine and reactor to limit power generation;
- Isolation of FW to limit secondary side mass losses;
- Start of AF to ensure secondary side cooling capability;
- Isolation of the control room to ensure habitability; and
- Enabling ECCS suction from the Refueling Water Storage Tank (RWST) switchover on low low RWST level to ensure continued cooling via use of the containment sump.

a. Safety Injection - Manual Initiation

The operator can initiate SI at any time by using either of two switches in the control room. This action will cause actuation of all components in the same manner as any of the automatic actuation signals.

The LCO requires two channels to be OPERABLE. Each channel consists of one switch and the interconnecting wiring to the actuation logic cabinet such that either switch will actuate both trains. This ensures the proper amount of redundancy is maintained in the manual ESFAS actuation circuitry to ensure the operator has manual ESFAS initiation capability.

The applicability of the SI Manual Initiation Function is discussed with the Automatic Actuation Logic and Actuation Relay Function below.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Safety Injection - Automatic Actuation Logic and Actuation Relays

This LCO requires two trains to be OPERABLE. Actuation logic consists of all circuitry housed within the actuation subsystems, including the initiating relay contacts responsible for actuating the ESF equipment.

Manual and automatic initiation of SI must be OPERABLE in MODES 1, 2, and 3. In these MODES, there is sufficient energy in the primary and secondary systems to warrant automatic initiation of ESF systems. Manual Initiation is also required in MODE 4 even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA, but because of the large number of components actuated on an SI, actuation is simplified by the use of the manual actuation switches. Automatic actuation logic and actuation relays must be OPERABLE in MODE 4 to support system level manual initiation.

These Functions are not required to be OPERABLE in MODES 5 and 6 because there is adequate time for the operator to evaluate unit conditions and respond by manually starting individual systems, pumps, and other equipment to mitigate the consequences of an abnormal condition or accident. Unit pressure and temperature are very low and many ESF components are administratively locked out or otherwise prevented from actuating to prevent inadvertent overpressurization of unit systems.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

c. Safety Injection-Containment Pressure-High 1

This signal provides protection against the following accidents:

- SLB inside containment;
- LOCA; and
- Feed line break inside containment.

Containment Pressure-High 1 provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy protective requirements with a two-out-of-three logic. The transmitters (d/p cells) and electronics are located outside of containment with the sensing line (high pressure side of the transmitter) located inside containment. Thus, the high pressure Function will not experience any adverse environmental conditions and the Trip Setpoint reflects only steady state instrument uncertainties.

Containment Pressure-High 1 must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the primary and secondary systems to pressurize the containment following a pipe break. In MODES 4, 5, and 6, there is insufficient energy in the primary or secondary systems to pressurize the containment.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

d. Safety Injection-Pressurizer Pressure-Low

This signal provides protection against the following accidents:

- Inadvertent opening of a SG relief or safety valve;
- SLB;
- A spectrum of rod cluster control assembly ejection accidents (rod ejection);
- Inadvertent opening of a pressurizer relief or safety valve;
- LOCAs; and
- SG Tube Rupture.

Pressurizer pressure provides both control and protection functions with inputs to the Pressurizer Pressure Control System, reactor trip, and SI. Therefore, the actuation logic must be able to withstand both an input failure to the control system, which may then require the protection function actuation, and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels are required to satisfy the requirements with a two-out-of-four logic.

The transmitters are located inside containment, with the taps in the vapor space region of the pressurizer, and thus possibly experiencing adverse environmental conditions (LOCA, SLB inside containment, rod ejection). Therefore, the Trip Setpoint reflects the inclusion of both steady state and adverse environmental instrument uncertainties.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

This Function must be OPERABLE in MODES 1, 2, and 3 (above P-11) to mitigate the consequences of an HELB inside containment. This signal may be manually blocked by the operator below the P-11 setpoint. Automatic SI actuation below this pressure setpoint is then performed by the Containment Pressure-High 1 signal.

This Function is not required to be OPERABLE in MODE 3 below the P-11 setpoint. Other ESF functions are used to detect accident conditions and actuate the ESF systems in this MODE. In MODES 4, 5, and 6, this Function is not needed for accident detection and mitigation.

e. Safety Injection- Steam Line Pressure-Low

Steam Line Pressure-Low provides protection against the following accidents:

- SLB;
- Feed line break; and
- Inadvertent opening of an SG relief or an SG safety valve.

Steam Line Pressure-Low provides a control input to density compensate the steam flow channels that are part of the SG water level control function. However, this control function cannot cause the events that the Function must protect against. Thus, three OPERABLE channels on each steam line are sufficient to satisfy the protective requirements with a two-out-of-three logic on each steam line.

With the transmitters typically located inside the steam tunnels, it is possible for them to experience adverse environmental conditions during a secondary side break. Therefore, the Trip Setpoint reflects both steady state and adverse environmental instrument uncertainties.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

This Function is anticipatory in nature and has a typical lead/lag ratio of 50/5.

Steam Line Pressure-Low must be OPERABLE in MODES 1, 2, and 3 (above P-11) when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This signal may be manually blocked by the operator below the P-11 setpoint. Below P-11, feed line break is not a concern. Inside containment, SLB will be terminated by automatic SI actuation via Containment Pressure-High 1, and outside containment SLB will be terminated by the Steam Line Pressure-Negative Rate-High signal for steam line isolation. This Function is not required to be OPERABLE in MODE 4, 5, or 6 because there is insufficient energy in the secondary side of the unit that would result in a release of enough quantities of energy to cause a significant cooldown of the RCS.

2. Containment Spray

Containment Spray provides three primary functions:

1. Lowers containment pressure and temperature after an HELB in containment;
2. Reduces the amount of radioactive iodine in the containment atmosphere; and
3. Adjusts the pH of the water in the containment recirculation sump after a large break LOCA.

## BASES

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### APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

These functions are necessary to:

- Ensure the pressure boundary integrity of the containment structure;
- Limit the release of radioactive iodine to the environment in the event of a failure of the containment structure; and
- Minimize corrosion of the components and systems inside containment following a LOCA.

The containment spray actuation signal starts the containment spray pumps and aligns the discharge of the pumps to the containment spray nozzle headers in the upper levels of containment. Water is initially drawn from the RWST by the containment spray pumps and mixed with a sodium hydroxide solution from the spray additive tank. When the RWST reaches the Low-3 level setpoint, the spray pump suctions are shifted to the containment sump if continued containment spray is required. Containment spray is actuated manually or automatically by Containment Pressure-High 3.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Containment Spray – Manual Initiation

The operator can initiate containment spray at any time from the control room by simultaneously turning two containment spray actuation switches in the same channel. Because an inadvertent actuation of containment spray could have such serious consequences, two switches must be turned simultaneously to initiate containment spray. There are two sets of two switches each in the control room. Each set of two switches is considered a channel. Simultaneously turning the two switches in either set will actuate containment spray in both trains in the same manner as the automatic actuation signal. Two Manual Initiation channels are required to be OPERABLE to ensure no single failure disables the Manual Initiation Function. Note that Manual Initiation of containment spray also actuates Phase B containment isolation.

b. Containment Spray – Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Manual and automatic initiation of containment spray must be OPERABLE in MODES 1, 2, and 3 when there is a potential for an accident to occur, and sufficient energy in the primary or secondary systems to pose a threat to containment integrity due to overpressure conditions. Manual initiation is also required in MODE 4, even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA. However, because of the large number of components actuated on a containment spray, actuation is simplified by the use of the manual actuation switches. Automatic actuation logic and actuation relays must be OPERABLE in MODE 4 to support system level manual initiation. In MODES 5 and 6, there is insufficient energy in the primary and secondary systems to result in containment overpressure. In MODES 5 and 6, there is also adequate time for the operators to evaluate unit conditions and respond, to mitigate the consequences of abnormal conditions by manually starting individual components.

c. Containment Spray - Containment Pressure - High 3

This signal provides protection against a LOCA or an SLB inside containment. The transmitters (d/p cells) and electronics are located outside of containment with the sensing line (high pressure side of the transmitter) located inside containment. Thus, the high pressure function will not experience any adverse environmental conditions and the Trip Setpoint reflects only steady state instrument uncertainties.

This Function requires the bistable output to energize to perform its required action. It is not desirable to have a loss of power actuate containment spray, since the consequences of an inadvertent actuation of containment spray could be serious. Note that this Function also has the inoperable channel placed in bypass rather than trip to decrease the probability of an inadvertent actuation.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Four channels of containment pressure are utilized in a two-out-of-four logic configuration. Since containment pressure is not used for control, this arrangement exceeds the minimum redundancy requirements. Additional redundancy is warranted because this Function is energize to trip.

Containment Pressure-High 3 must be OPERABLE in MODES 1, 2, and 3 when there is sufficient energy in the primary and secondary sides to pressurize the containment following a pipe break. In MODES 4, 5, and 6, there is insufficient energy in the primary and secondary sides to pressurize the containment and reach the Containment Pressure-High 3 setpoint.

3. Containment Isolation

Containment Isolation provides isolation of the containment atmosphere, and all process systems that penetrate containment, from the environment. This Function is necessary to prevent or limit the release of radioactivity to the environment in the event of a large break LOCA.

There are two separate Containment Isolation signals, Phase A and Phase B. The Phase A signal isolates all automatically isolable process lines, except Component Cooling water (CC), at a relatively low containment pressure indicative of primary or secondary system leaks. For these types of events, forced circulation cooling using the Reactor Coolant Pumps (RCPs) and SGs is the preferred (but not required) method of decay heat removal. Since CC is required to support RCP operation, not isolating CC on the low pressure Phase A signal enhances unit safety by allowing operators to use forced RCS circulation to cool the unit. Isolating CC on the low pressure signal may force the use of feed and bleed cooling, which could prove more difficult to control.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Phase A Containment Isolation is actuated automatically by SI, or manually via the automatic actuation logic. All process lines penetrating containment, with the exception of CC, are isolated. CC is not isolated at this time to permit continued operation of the RCPs with cooling water flow to the thermal barrier heat exchangers and RCP motor bearing oil coolers. All process lines not equipped with remote operated isolation valves are manually closed, or otherwise isolated, prior to reaching MODE 4.

Manual Phase A Containment Isolation is accomplished by either of two switches in the control room. Either switch actuates both trains. Note that manual actuation of Phase A Containment Isolation also actuates Containment Ventilation Isolation.

The Phase B signal isolates CC. This occurs at a relatively high containment pressure that is indicative of a large break LOCA or an SLB. For these events, forced circulation using the RCPs is no longer desirable. Isolating the CC at the higher pressure does not pose a challenge to the containment boundary because the CC System is a closed loop inside containment. Although some system components do not meet all of the ASME Code requirements applied to the containment itself, the system is continuously pressurized to a pressure greater than the Phase B setpoint. Thus, routine operation demonstrates the integrity of the system pressure boundary for pressures exceeding the Phase B setpoint. Furthermore, because system pressure exceeds the Phase B setpoint, any system leakage prior to initiation of Phase B isolation would be into containment. Therefore, the combination of CC System design and Phase B isolation ensures the CC System is not a potential path for radioactive release from containment.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Phase B Containment Isolation is actuated by Containment Pressure-High 3, or manually, via the automatic actuation logic. For containment pressure to reach a value high enough to actuate Containment Pressure-High 3, a large break LOCA or SLB must have occurred and containment spray must have been actuated. RCP operation will no longer be required and CC to the RCPs is, therefore, no longer necessary.

Manual Phase B Containment Isolation is accomplished by the same switches that actuate Containment Spray. When the two switches in either set are turned simultaneously, Phase B Containment Isolation and Containment Spray will be actuated in both trains.

a. Containment Isolation-Phase A Isolation

(1) Phase A Isolation-Manual Initiation

Manual Phase A Containment Isolation is actuated by either of two switches in the control room. Either switch actuates both trains. Each switch is considered a channel. Note that manual initiation of Phase A Containment Isolation also actuates Containment Ventilation Isolation.

(2) Phase A Isolation-Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Manual and automatic initiation of Phase A Containment Isolation must be OPERABLE in MODES 1, 2, and 3, when there is a potential for an accident to occur. Manual initiation is also required in MODE 4 even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA, but because of the large number of components actuated on a Phase A Containment Isolation, actuation is simplified by the use of the manual actuation switches. Automatic actuation logic and actuation relays must be OPERABLE in MODE 4 to support system level manual initiation. In MODES 5 and 6, there is insufficient energy in the primary or secondary systems to pressurize the containment to require Phase A Containment Isolation. Also, there is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

(3) Phase A Isolation-Safety Injection

Phase A Containment Isolation is also initiated by all Functions that initiate SI. The Phase A Containment Isolation requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating Functions and requirements.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

b. Containment Isolation-Phase B Isolation

Phase B Containment Isolation is accomplished by Manual Initiation, Automatic Actuation Logic and Actuation Relays, and by Containment Pressure channels (the same channels that actuate Containment Spray, Function 2). The Phase B Containment Isolation Function requires the bistable output to energize to trip in order to minimize the potential of spurious trips that may damage the RCPs.

(1) Phase B Isolation-Manual Initiation

Manual Phase B Containment Isolation is actuated by simultaneously turning two switches in the same train. There are two sets of two switches each in the control room. Each set of two switches is considered a channel.

(2) Phase B Isolation-Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Manual and automatic initiation of Phase B containment isolation must be OPERABLE in MODES 1, 2, and 3, when there is a potential for an accident to occur. Manual initiation is also required in MODE 4 even though automatic actuation is not required. In this MODE, adequate time is available to manually actuate required components in the event of a DBA. However, because of the large number of components actuated on a Phase B containment isolation, actuation is simplified by the use of the manual actuation switches. Automatic actuation logic and actuation relays must be OPERABLE in MODE 4 to support system level manual initiation. In MODES 5 and 6, there is insufficient energy in the primary or secondary systems to pressurize the containment to require Phase B containment isolation. There also is adequate time for the operator to evaluate unit conditions and manually actuate individual isolation valves in response to abnormal or accident conditions.

(3) Phase B Isolation-Containment Pressure-High 3

The basis for containment pressure MODE applicability is as discussed for ESFAS Function 2.c above.

4. Steam Line Isolation

Isolation of the main steam lines provides protection in the event of an SLB inside or outside containment. Rapid isolation of the steam lines will limit the steam break accident to the blowdown from one SG, at most. For an SLB upstream of the MSIVs, inside or outside of containment, closure of the MSIVs and their bypass valves limits the accident to the blowdown from only the affected SG. For an SLB downstream of the MSIVs, closure of the MSIVs and their bypass valves terminates the accident as soon as the steam lines depressurize.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Steam Line Isolation—Manual Initiation

Manual initiation of Steam Line Isolation can be accomplished from the control room. There are two switches in the control room and either switch can initiate action to immediately close all MSIVs. The LCO requires two channels to be OPERABLE.

b. Steam Line Isolation—Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

Manual and automatic initiation of steam line isolation must be OPERABLE in MODES 1, 2, and 3, when there is sufficient energy in the RCS and SGs to have an SLB or other accident. This could result in the release of significant quantities of energy and cause a cooldown of the primary system. The Steam Line Isolation Function is not required in MODES 2 and 3 when all MSIVs and their bypass valves are closed. In MODES 4, 5, and 6, there is insufficient energy in the RCS and SGs to experience an SLB or other accident releasing significant quantities of energy.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

c. Steam Line Isolation-Containment Pressure-High 2

This Function actuates closure of the MSIVs and their bypass valves in the event of a LOCA or an SLB inside containment to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. The transmitters (d/p cells) and electronics are located outside containment with the sensing line (high pressure side of the transmitter) located inside containment. Containment Pressure-High 2 provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy protective requirements with two-out-of-three logic. Thus, they will not experience any adverse environmental conditions, and the Trip Setpoint reflects only steady state instrument uncertainties.

Containment Pressure-High 2 must be OPERABLE in MODES 1, 2, and 3, when there is sufficient energy in the primary and secondary side to pressurize the containment following a pipe break. This would cause a significant increase in the containment pressure, thus allowing detection and closure of the MSIVs and their bypass valves. The Steam Line Isolation Function is not required in MODES 2 and 3 when all MSIVs and their bypass valves are closed. In MODES 4, 5, and 6, there is not enough energy in the primary and secondary sides to pressurize the containment to the Containment Pressure-High 2 setpoint.

d. Steam Line Isolation-Steam Line Pressure

(1) Steam Line Pressure-Low

Steam Line Pressure-Low provides closure of the MSIVs and their bypass valves in the event of an SLB to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. Steam Line Pressure-Low was discussed previously under SI Function 1.e.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Steam Line Pressure-Low Function must be OPERABLE in MODE 1, and in MODES 2 and 3 (above P-11), with any MSIV and associated bypass valve open, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This signal may be manually blocked by the operator below the P-11 setpoint. Below P-11, an inside containment SLB will be terminated by automatic actuation via Containment Pressure-High 2. Stuck valve transients and outside containment SLBs will be terminated by the Steam Line Pressure-Negative Rate-High signal for Steam Line Isolation below P-11 when SI has been manually blocked. The Steam Line Isolation Function is required in MODES 2 and 3 unless all MSIVs and their bypass valves are closed. This Function is not required to be OPERABLE in MODES 4, 5, and 6 because there is insufficient energy in the secondary side of the unit that would result in a release of enough quantities of energy to cause a significant cooldown of the RCS.

(2) Steam Line Pressure-Negative Rate-High

Steam Line Pressure-Negative Rate-High provides closure of the MSIVs and their bypass valves for an SLB when less than the P-11 setpoint, to maintain at least one unfaulted SG as a heat sink for the reactor, and to limit the mass and energy release to containment. When the operator manually blocks the Steam Line Pressure-Low main steam isolation signal when less than the P-11 setpoint, the Steam Line Pressure-Negative Rate-High signal is automatically enabled. Steam Line Pressure-Negative Rate-High provides no input to any control functions. Thus, three OPERABLE channels are sufficient to satisfy requirements with a two-out-of-three logic on each steam line.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

Steam Line Pressure-Negative Rate-High must be OPERABLE in MODE 3 when less than the P-11 setpoint, when a secondary side break or stuck open valve could result in the rapid depressurization of the steam line(s). In MODES 1 and 2, and in MODE 3, when above the P-11 setpoint, this signal is automatically disabled and the Steam Line Pressure-Low signal is automatically enabled. The Steam Line Isolation Function is not required in MODE 3 when all MSIVs and their bypass valves are closed. In MODES 4, 5, and 6, there is insufficient energy in the primary and secondary sides to have an SLB or other accident that would result in a release of enough quantities of energy to cause a significant cooldown of the RCS.

While the transmitters may experience elevated ambient temperatures due to an SLB, the trip function is based on rate of change, not the absolute accuracy of the indicated steam pressure. Therefore, the Trip Setpoint reflects only steady state instrument uncertainties.

5. Turbine Trip and Feedwater Isolation

The primary functions of the Turbine Trip and Feedwater Isolation signals are to prevent damage to the turbine due to water in the steam lines, and to stop the excessive flow of feedwater into the SGs. These Functions are necessary to mitigate the effects of a high water level in the SGs, which could result in carryover of water into the steam lines and excessive cooldown of the primary system. The SG high water level is due to excessive feedwater flows.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The Function is actuated when the level in any SG exceeds the high high setpoint, and performs the following functions:

- Trips the main turbine;
- Trips the FW pumps;
- Initiates feedwater isolation; and
- Shuts the FW pump discharge valves.

This Function is actuated by SG Water Level-High High, or by an SI signal. The RTS also initiates a turbine trip signal whenever a reactor trip (P-4) is generated. In the event of SI, the unit is tripped and the turbine generator is tripped. The FW System is also taken out of operation and the AF System is automatically started.

a. Turbine Trip and Feedwater Isolation-Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Turbine Trip and Feedwater Isolation-Steam Generator Water Level-High High (P-14)

This signal provides protection against excessive feedwater flow. The ESFAS SG water level instruments provide input to the SG Water Level Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system (which may then require the protection function actuation) and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels per SG are required to satisfy the requirements with a two-out-of-four logic. The channel Allowable Values are specified in percent of narrow range instrument span.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

The transmitters (d/p cells) are located inside containment. However, the events that this Function protects against cannot cause a severe environment in containment. Therefore, the Trip Setpoint reflects only steady state instrument uncertainties.

c. Turbine Trip and Feedwater Isolation-Safety Injection

Turbine Trip and Feedwater Isolation is also initiated by all Functions that initiate SI. The Feedwater Isolation Function requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead Function 1, SI, is referenced for all initiating functions and requirements.

Turbine Trip and Feedwater Isolation Functions must be OPERABLE in MODE 1, and in MODES 2 and 3 except when all Feedwater (FW) Isolation Valves are closed or isolated by a closed manual valve when the FW System is in operation and the turbine generator may be in operation. In MODES 4, 5, and 6, the FW System and the turbine generator are not in service and this Function is not required to be OPERABLE. The applicable FW Isolation Valves are listed below:

- FW Isolation Valve (FW009A through D)
- FW Tempering Flow Control Valve (FW034A through D)
- FW Tempering Valve (FW035A through D)
- Low Flow FW Isolation Valve (FW039A through D-Unit 1 only)
- FW Preheater Bypass Isolation Valve (FW039A through D-Unit 2 only)
- FW Isolation Bypass Valve (FW043A through D-Unit 2 only)
- FW Regulating Valve (FW510,520,530,540)
- FW Regulating Bypass Valve (FW510A,520A,530A,540A)

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

6. Auxiliary Feedwater

The AF System is designed to provide a secondary side heat sink for the reactor in the event that the FW System is not available. The system has a motor driven pump and a diesel driven pump which are described in LCO 3.7.5, "AF System."

a. Auxiliary Feedwater - Automatic Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Auxiliary Feedwater - Steam Generator Water Level - Low Low

SG Water Level - Low Low provides protection against a loss of heat sink. A feed line break, inside or outside of containment, or a loss of FW, would result in a loss of SG water level. SG Water Level - Low Low provides input to the SG Level Control System. Therefore, the actuation logic must be able to withstand both an input failure to the control system which may then require a protection function actuation and a single failure in the other channels providing the protection function actuation. Thus, four OPERABLE channels per SG are required to satisfy the requirements with two-out-of-four logic. The channel Allowable Values are specified in percent of narrow range instrument span.

With the transmitters (d/p cells) located inside containment and thus possibly experiencing adverse environmental conditions (feed line break), the Trip Setpoint reflects the inclusion of both steady state and adverse environmental instrument uncertainties.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

c. Auxiliary Feedwater-Safety Injection

An SI signal starts the motor driven and diesel driven AF pumps. The AF initiation functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating functions and requirements.

d. Auxiliary Feedwater-Loss of Offsite Power  
(Undervoltage on Bus 141(241))

The loss of offsite power to bus 141(241) is detected by a voltage drop on the bus. Upon restoration of power via the "A" DG to bus 141(241), which supplies the motor driven AF pump, the motor driven AF pump will automatically start to ensure that at least one SG contains enough water to serve as the heat sink for reactor decay heat and sensible heat removal following the reactor trip.

Functions 6.a through 6.d must be OPERABLE in MODES 1, 2, and 3 to ensure that the SGs remain the heat sink for the reactor. SG Water Level-Low Low in any operating SG will cause the motor and diesel driven AF pumps to start. The system is aligned so that upon a start of the pump, water immediately begins to flow to the SGs. These Functions do not have to be OPERABLE in MODES 4, 5, and 6 because the Steam Generators are not normally used for heat removal, and the AF System is not required.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

e. Auxiliary Feedwater-Undervoltage Reactor Coolant Pump

A loss of power on the buses that provide power to the RCPs provides indication of a pending loss of RCP forced flow in the RCS. The Undervoltage RCP Function senses a loss of power on two or more RCP buses and starts the AF pumps to ensure that at least one SG contains enough water to serve as the heat sink for reactor decay heat and sensible heat removal following the reactor trip.

There are two undervoltage sensing relays on each 6.9 kV bus which feeds an RCP. One relay provides an input to actuation logic Train A and the other relay provides an input to actuation logic Train B. Each actuation logic train requires input from two of the four buses to initiate both AF pumps. Each train is considered a separate Function.

This Function must be OPERABLE in MODES 1 and 2. This ensures that at least one SG is provided with water to serve as the heat sink to remove reactor decay heat and sensible heat in the event of an accident. In MODES 3, 4, and 5, the RCPs may be normally shut down, and thus, a pump trip is not indicative of a condition requiring automatic AF initiation.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

f. Auxiliary Feedwater - Pump Suction Transfer on Suction Pressure - Low

A low pressure signal in the AF pump suction line coincident with an automatic start signal protects the AF pumps against a loss of the normal supply of water for the pumps, the Condensate Storage Tank (CST). A pressure transmitter is located on each AF pump suction line from the CST. After an automatic start, a low pressure signal will cause the emergency supply of water for the associated pump to be aligned, or cause the associated AF pump to stop until the emergency source of water is aligned. The Essential Service Water System (safety grade) is then lined up to supply the AF pump to ensure an adequate supply of water for the AF System to maintain at least one of the SGs as the heat sink for reactor decay heat and sensible heat removal.

Since the detectors are located in an area not affected by HELBs or high radiation, they will not experience any adverse environmental conditions and the Trip Setpoint reflects only steady state instrument uncertainties.

This Function must be OPERABLE in MODES 1, 2, and 3 to ensure a safety grade supply of water for the AF System to maintain the SGs as the heat sink for the reactor. This Function does not have to be OPERABLE in MODES 4, 5, and 6 because the SGs are not normally used for heat removal and the AF System is not required.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

7. Switchover to Containment Sump

At the end of the safety injection phase of a LOCA, the RWST will be nearly empty. Continued cooling must be provided by the ECCS to remove decay heat. The source of water for the ECCS pumps is switched to the containment recirculation sump. The low head Residual Heat Removal (RHR) pumps and containment spray pumps draw the water from the containment recirculation sump. The RHR pumps pump the water through the RHR heat exchanger, inject the water back into the RCS, and supply the cooled water to the other ECCS pumps. The ECCS switchover from safety injection to cold leg recirculation is initiated automatically upon receipt of the RWST auto switchover trip signal and is completed via timely operator action at the main control board. Switchover from the RWST to the containment sump must be completed before the RWST empties to prevent damage to the ECCS pumps and a loss of core cooling capability. For similar reasons, switchover must not occur before there is sufficient water in the containment sump to support ECCS pump suction. Furthermore, early switchover must not occur to ensure that sufficient borated water is injected from the RWST. This ensures the reactor remains shut down in the recirculation mode.

Switchover is initiated via automatic opening of the containment recirculation sump isolation valves (SI8811 A/B). This automatic action aligns the suction of the RHR pumps to the containment recirculation sump to ensure continued availability of a suction source. Upon receipt of the RWST low low level switchover alarm, the operator is required to initiate the manual operations required to complete switchover in a timely manner (Ref. 1).

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Switchover to Containment Sump-Automatic  
Actuation Logic and Actuation Relays

Automatic actuation logic and actuation relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Switchover to Containment Sump-Refueling Water  
Storage Tank (RWST) Level-Low Low Coincident With  
Safety Injection

During the injection phase of a LOCA, the RWST is the source of water for all ECCS pumps. A low low level in the RWST coincident with an SI signal provides protection against a loss of water for the ECCS pumps and indicates the end of the injection phase of the LOCA. The RWST is equipped with four level transmitters. These transmitters provide no control functions. Therefore, a two-out-of-four logic is adequate to initiate the protection function actuation. Although only three channels would be sufficient, a fourth channel has been added for increased reliability.

The transmitters are located in an area not affected by HELBs or post accident high radiation. Thus, they will not experience any adverse environmental conditions and the Trip Setpoint reflects only steady state instrument uncertainties.

Automatic opening of the containment sump suction valves occurs only if the RWST low low level signal is coincident with SI. This prevents accidental switchover during normal operation. Accidental switchover could damage ECCS pumps if they are attempting to take suction from an empty sump. The switchover Function requirements for the SI Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead, Function 1, SI, is referenced for all initiating Functions and requirements.

BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

These Functions must be OPERABLE in MODES 1, 2, 3, and 4 when there is a potential for a LOCA to occur, to ensure a continued supply of water for the ECCS pumps. These Functions are not required to be OPERABLE in MODES 5 and 6 because there is adequate time for the operator to evaluate unit conditions and respond by manually initiating the switchover and starting systems, pumps, and other equipment to mitigate the consequences of an abnormal condition or accident. System pressure and temperature are very low and many ESF components are administratively locked out or otherwise prevented from actuating to prevent inadvertent overpressurization of unit systems.

8. Engineered Safety Feature Actuation System Interlocks

To allow some flexibility in unit operations, several interlocks are included as part of the ESFAS. These interlocks permit the operator to block some signals, automatically enable other signals, prevent some actions from occurring, and cause other actions to occur. The interlock Functions back up manual actions to ensure bypassable functions are in operation under the conditions assumed in the safety analyses.



BASES

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APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

a. Engineered Safety Feature Actuation System  
Interlocks - Reactor Trip, P-4

The P-4 interlock is enabled when a Reactor Trip Breaker (RTB) and its associated bypass breaker is open. Once the P-4 interlock is enabled, automatic SI initiation may be manually blocked after a 60 second time delay. This Function allows operators to take manual control of SI Systems after the initial phase of injection is complete. Once SI is blocked, automatic actuation of SI cannot occur until the P-4 interlock has been momentarily cleared by closing the RTB. The functions of the P-4 interlock are:

- Trip the main turbine;
- Isolate FW;
- Prevent automatic reactuation of SI after a manual reset of SI; and
- Prevent opening of the FW isolation valves if they were closed on SI or SG Water Level - High High.

Each of the above Functions is interlocked with P-4 to avert or reduce the continued cooldown of the RCS following a reactor trip. An excessive cooldown of the RCS following a reactor trip could cause an insertion of positive reactivity with a subsequent increase in core power. To avoid such a situation, the noted Functions have been interlocked with P-4 as part of the design of the unit control and protection system.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

None of the noted Functions serves a mitigation function in the plant licensing basis safety analyses. Only the turbine trip Function is explicitly assumed since it is an immediate consequence of the reactor trip Function. Neither turbine trip, nor any of the other Functions associated with the reactor trip signal, is required to show that the plant licensing basis safety analysis acceptance criteria are not exceeded.

The RTB position switches that provide input to the P-4 interlock only function to energize or de-energize (open or close) contacts. Therefore, this Function has no adjustable trip setpoint with which to associate a Trip Setpoint and Allowable Value.

This Function must be OPERABLE in MODES 1, 2, and 3 when the reactor may be critical or approaching criticality. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because the main turbine, and the FW System are not in operation.

b. Engineered Safety Feature Actuation System  
Interlocks - Pressurizer Pressure, P-11

The P-11 interlock permits a normal unit cooldown and depressurization without actuation of SI or main steam line isolation. With two-out-of-three pressurizer pressure channels less than the P-11 setpoint, the operator can manually block the Pressurizer Pressure-Low and Steam Line Pressure-Low SI signals and the Steam Line Pressure-Low steam line isolation signal (previously discussed). When the Steam Line Pressure-Low steam line isolation signal is manually blocked, a main steam isolation signal on Steam Line Pressure-Negative Rate-High is enabled. This provides protection for an SLB by closure of the MSIVs and their bypass valves.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

With two-out-of-three pressurizer pressure channels above the P-11 setpoint, the Pressurizer Pressure-Low and Steam Line Pressure-Low SI signals and the Steam Line Pressure-Low steam line isolation signal are automatically enabled. The operator can also enable these trips by use of the respective manual reset buttons. When the Steam Line Pressure-Low steam line isolation signal is enabled, the main steam isolation on Steam Line Pressure-Negative Rate-High is disabled.

This Function must be OPERABLE in MODES 1, 2, and 3 to allow an orderly cooldown and depressurization of the unit without the actuation of SI or main steam isolation. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because system pressure must already be below the P-11 setpoint for the requirements of the heatup and cooldown curves to be met.

c. Engineered Safety Feature Actuation System  
Interlocks -  $T_{avg}$  - Low Low, P-12

On increasing reactor coolant temperature, the P-12 interlock provides an arming signal to the Steam Dump System. On a decreasing temperature, the P-12 interlock removes the arming signal to the Steam Dump System to prevent an excessive cooldown of the RCS due to a malfunctioning Steam Dump System.

Since  $T_{avg}$  is used as an indication of bulk RCS temperature, this Function meets redundancy requirements with one OPERABLE channel in each loop. In four loop units, these channels are used in a two-out-of-four logic.

## BASES

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### APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

This Function must be OPERABLE in MODES 1, 2, and 3 when a secondary side break or stuck open valve could result in the rapid depressurization of the steam lines. This Function does not have to be OPERABLE in MODE 4, 5, or 6 because there is insufficient energy in the secondary side of the unit to have an accident.

The ESFAS instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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## ACTIONS

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each channel listed on Table 3.3.2-1.

In the event a channel's Trip Setpoint is found nonconservative with respect to the Allowable Value, or the transmitter, instrument loop, signal processing electronics, or bistable is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO Condition(s) entered for the protection Function(s) affected. When the Required Channels in Table 3.3.2-1 are specified on a per steam line, per loop, per SG, etc., basis, then the Condition may be entered separately for each steam line, loop, SG, etc., as appropriate.

When the number of inoperable channels in a trip function exceeds those specified in all related Conditions associated with a trip function, then the unit is outside the safety analysis. Therefore, LCO 3.0.3 should be immediately entered if applicable in the current MODE of operation.

### A.1

Condition A applies to all ESFAS protection functions. Condition A addresses the situation where one or more required channels or trains for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.2-1 and to take the Required Actions for the protection functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

BASES

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ACTIONS (continued)

B.1, B.2.1, and B.2.2

Condition B applies to manual initiation of:

- SI;
- Containment Spray;
- Phase A Isolation; and
- Phase B Isolation.

This action addresses the train orientation of the SSPS for the functions listed above. If one channel is inoperable, 48 hours is allowed to return it to an OPERABLE status. Note that for containment spray and Phase B isolation, failure of one or both switches in one channel renders the channel inoperable. Condition B, therefore, encompasses both situations. The specified Completion Time is reasonable considering that there are two automatic actuation trains and another manual initiation train OPERABLE for each Function, and the low probability of an event occurring during this interval. If the train cannot be restored to OPERABLE status, the unit must be placed in a MODE in which the LCO does not apply. This is done by placing the unit in at least MODE 3 within an additional 6 hours (54 hours total time) and in MODE 5 within an additional 30 hours (84 hours total time). The allowable 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.

BASES

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ACTIONS (continued)

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

Condition C applies to the automatic actuation logic and actuation relays for the following functions:

- SI;
- Containment Spray;
- Phase A Isolation;
- Phase B Isolation; and
- Automatic Switchover to Containment Sump.

This action addresses the train orientation of the SSPS and the master and slave relays. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The specified Completion Time is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be restored to OPERABLE status, the unit must be placed in a MODE in which the LCO does not apply. This is done by placing the unit in at least MODE 3 within an additional 6 hours (12 hours total time) and in MODE 5 within an additional 30 hours (42 hours total time). The 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.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 4 hours for surveillance testing, provided the other train is OPERABLE. This allowance is based on the reliability analysis assumption of WCAP-10271-P-A (Ref. 7) that 4 hours is the average time required to perform channel surveillance.

BASES

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ACTIONS (continued)

D.1, D.2.1, and D.2.2

Condition D applies to:

- Containment Pressure-High 1;
- Pressurizer Pressure-Low;
- Steam Line Pressure-Low;
- Containment Pressure-High 2;
- Steam Line Pressure-Negative Rate-High;
- SG Water Level-Low Low; and
- SG Water Level-High High (P-14).

If one channel is inoperable, 6 hours are allowed to restore the channel to OPERABLE status or to place it in the tripped condition. Generally, this Condition applies to functions that operate on two-out-of-three logic or a two-out-of-four logic. Therefore, failure of one channel places the Function in a two-out-of-two configuration. One channel must be tripped to place the Function in a one-out-of-two configuration that satisfies redundancy requirements.

Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within 6 hours requires the unit be placed in MODE 3 within the following 6 hours and MODE 4 within the next 6 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. In MODE 4, these Functions are no longer required OPERABLE.

BASES

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ACTIONS (continued)

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. The 6 hours allowed to restore the channel to OPERABLE status or to place the inoperable channel in the tripped condition, and the 4 hours allowed for testing, are justified in Reference 7.

E.1, E.2.1, and E.2.2

Condition E applies to:

- Containment Spray Containment Pressure-High 3; and
- Containment Phase B Isolation Containment Pressure-High 3.

None of these signals has input to a control function. Thus, two-out-of-three logic is necessary to meet acceptable protective requirements. However, a two-out-of-three design would require tripping a failed channel. This is undesirable because a single failure would then cause spurious containment spray initiation. Spurious spray actuation is undesirable because of the cleanup problems presented. Therefore, these channels are designed with two-out-of-four logic so that a failed channel may be bypassed rather than tripped. Note that one channel may be bypassed and still satisfy the single failure criterion. Furthermore, with one channel bypassed, a single instrumentation channel failure will not spuriously initiate containment spray.



## BASES

### ACTIONS (continued)

To avoid the inadvertent actuation of containment spray and Phase B containment isolation, the inoperable channel should not be placed in the tripped condition. Instead it is bypassed. Restoring the channel to OPERABLE status, or placing the inoperable channel in the bypass condition within 6 hours, is sufficient to assure that the Function remains OPERABLE and minimizes the time that the Function may be in a partial trip condition (assuming the inoperable channel has failed in a trip condition). The Completion Time is further justified based on the low probability of an event occurring during this interval. The Completion Time is further justified based on the low probability of an event occurring during this interval. Failure to restore the inoperable channel to OPERABLE status, or place it in the bypassed condition within 6 hours, requires the unit be placed in MODE 3 within the following 6 hours and MODE 4 within the next 6 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. In MODE 4, these Functions are no longer required OPERABLE.

The Required Actions are modified by a Note that allows one additional channel to be bypassed for up to 4 hours for surveillance testing. Placing a second channel in the bypass condition for up to 4 hours for testing purposes is acceptable based on the results of Reference 7.

BASES

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ACTIONS (continued)

F.1, F.2.1, and F.2.2

Condition F applies to:

- Manual Initiation of Steam Line Isolation; and
- P-4 Interlock.

For the Manual Initiation and the P-4 Interlock Functions, this action addresses the train orientation of the SSPS. If a train or channel is inoperable, 48 hours is allowed to return it to OPERABLE status. The specified Completion Time is reasonable considering the nature of these Functions, the available redundancy, and the low probability of an event occurring during this interval. If the Function cannot be returned to OPERABLE status, the unit must be placed in MODE 3 within the next 6 hours and MODE 4 within the following 6 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power in an orderly manner and without challenging unit systems. In MODE 4, the unit does not have any analyzed transients or conditions that require the explicit use of the protection functions noted above.

G.1, G.2.1 and G.2.2

Condition G applies to the automatic actuation logic and actuation relays for the Steam Line Isolation, Turbine Trip and Feedwater Isolation, and AF actuation Functions.

BASES

ACTIONS (continued)

The action addresses the train orientation of the SSPS and the master and slave relays for these functions. If one train is inoperable, 6 hours are allowed to restore the train to OPERABLE status. The Completion Time for restoring a train to OPERABLE status is reasonable considering that there is another train OPERABLE, and the low probability of an event occurring during this interval. If the train cannot be returned to OPERABLE status, the unit must be brought to MODE 3 within the next 6 hours and MODE 4 within the following 6 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. Placing the unit in MODE 4 removes all requirements for OPERABILITY of the protection channels and actuation functions. In this MODE, the unit does not have analyzed transients or conditions that require the explicit use of the protection functions noted above.

The Required Actions are modified by a Note that allows one train to be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. This allowance is based on the reliability analysis (Ref. 7) assumption that 4 hours is the average time required to perform channel surveillance.

H.1, H.2.1, and H.2.2

Condition H applies to Loss of Offsite Power. For this Function, if one channel is inoperable, 1 hour is allowed to restore the channel to OPERABLE status or to place it in the tripped condition. Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within an hour requires the unit be placed in MODE 3 within the following 6 hours (total of 7 hours) and MODE 4 within the next 6 hours (total of 13 hours).

BASES

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ACTIONS (continued)

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. In MODE 4, the Function is no longer required OPERABLE.

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 2 hours for surveillance testing of other channels. The 1 hour allowed to restore the channel to OPERABLE status or to place the inoperable channel in the tripped condition, and the 2 hours allowed for testing, are deemed acceptable based on engineering judgement.

I.1 and I.2

Condition I applies to the Undervoltage Reactor Coolant Pump Function.

If one channel is inoperable, 6 hours are allowed to restore one channel to OPERABLE status or to place it in the tripped condition. If placed in the tripped condition, the Function is then in a partial trip condition on the affected train where one-out-of-three logic will result in actuation. The 6 hour Completion Time is justified in Reference 7. Failure to restore the inoperable channel to OPERABLE status or place it in the tripped condition within 6 hours requires the unit to be placed in MODE 3 within the following 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, these Functions are no longer required OPERABLE.

The Required Actions are modified by a Note that allows the inoperable channel to be bypassed for up to 4 hours for surveillance testing of other channels. The 6 hours allowed to place the inoperable channel in the tripped condition, and the 4 hours allowed for a second channel to be in the bypassed condition for testing, are justified in Reference 7.

BASES

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ACTIONS (continued)

J.1

Condition J applies to the Auxiliary Feedwater Pump Suction Transfer on Suction Pressure-Low Function. With one train inoperable, the associated auxiliary feedwater pump must be immediately declared inoperable. This requires entry into applicable Conditions and Required Actions of LCO 3.7.5, "AF System."

K.1, K.2.1, and K.2.2

Condition K applies to the RWST Level-Low Low Coincident with Safety Injection Function.

RWST Level-Low Low Coincident with SI provides actuation of switchover to the containment sump. Note that this Function requires the bistables to energize to perform their required action.

This Condition applies to a Function that operates on two-out-of-four logic. Therefore, failure of one channel places the Function in a two-out-of-three configuration. One channel must be tripped to place the Function in a one-out-of-three configuration that satisfies redundancy requirements.

If the channel cannot be returned to OPERABLE status or placed in the tripped condition within 6 hours, the unit must be brought to MODE 3 within the following 6 hours and MODE 5 within the next 30 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. In MODE 5, the unit does not have any analyzed transients or conditions that require the explicit use of the protection function noted above.

The Required Actions are modified by a Note that allows placing the inoperable channel in the bypass condition for up to 4 hours for surveillance testing of other channels. This is acceptable based on the results of Reference 7.

## BASES

### ACTIONS (continued)

#### L.1, L.2.1 and L.2.2

Condition L applies to the P-11 and P-12 interlocks.

With one or more channels inoperable, the operator must verify that the interlock is in the required state for the existing unit condition. This action manually accomplishes the function of the interlock. Determination must be made within 1 hour. The 1 hour Completion Time is equal to the time allowed by LCO 3.0.3 to initiate shutdown actions in the event of a complete loss of ESFAS function. If the interlock is not in the required state (or placed in the required state) for the existing unit condition, the unit must be placed in MODE 3 within the next 6 hours and MODE 4 within the following 6 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. Placing the unit in MODE 4 removes all requirements for OPERABILITY of these interlocks.

### SURVEILLANCE REQUIREMENTS

The SRs for each ESFAS Function are identified by the SRs column of Table 3.3.2-1.

A Note has been added to the SR Table to clarify that Table 3.3.2-1 determines which SRs apply to which ESFAS Functions.

Note that each channel of process protection supplies both trains of the ESFAS. When testing Channel I, Train A and Train B must be examined. Similarly, Train A and Train B must be examined when testing Channel II, Channel III, and Channel IV (if applicable). The CHANNEL CALIBRATION and COTs are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including indication and reliability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.2.2

SR 3.3.2.2 is the performance of a COT every 31 days. A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be found within the Allowable Values specified in Table 3.3.2-1.

The difference between the current "as found" values and the previous test "as left" values must be consistent with the calculated normal uncertainty consistent with the setpoint methodology. The setpoint shall be left set consistent with the assumptions of the current plant specific setpoint methodology.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The "as found" and "as left" values must also be recorded and reviewed for consistency with the assumptions of the surveillance interval extension analysis (Ref. 7) when applicable.

The Frequency is adequate based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.3

SR 3.3.2.3 is the performance of a TADOT every 31 days. This test is a check of the Loss of Offsite Power Function. The Function is tested up to, and including, the master relay coils.

The SR is modified by a Note that excludes verification of setpoints for relays. Relay setpoints require elaborate bench calibration and are verified during CHANNEL CALIBRATION. The Frequency is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.4

SR 3.3.2.4 is the performance of an ACTUATION LOGIC TEST. The SSPS is tested every 31 days on a STAGGERED TEST BASIS, using the semiautomatic tester. The train being tested is placed in the bypass condition, thus preventing inadvertent actuation. Through the semiautomatic tester, all possible logic combinations, with and without applicable permissives, are tested for each protection function. In addition, the master relay coil is pulse tested for continuity. This verifies that the logic modules are OPERABLE and that there is an intact voltage signal path to the master relay coils. The Frequency of every 31 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.5

SR 3.3.2.5 is the performance of a MASTER RELAY TEST. The MASTER RELAY TEST is the energizing of the master relay, verifying contact operation and a low voltage continuity check of the slave relay coil. Upon master relay contact operation, a low voltage is injected to the slave relay coil. This voltage is insufficient to pick up the slave relay, but large enough to demonstrate signal path continuity. This test is performed every 31 days on a STAGGERED TEST BASIS. The time allowed for the testing (4 hours) and the surveillance interval are justified in Reference 7.

SR 3.3.2.6

SR 3.3.2.6 is the performance of a COT.

A COT is performed on each required channel to ensure the entire channel will perform the intended Function. Setpoints must be found within the Allowable Values specified in Table 3.3.2-1.

The difference between the current "as found" values and the previous test "as left" values must be consistent with the calculated normal uncertainty consistent with the setpoint methodology. The setpoint shall be left set consistent with the assumptions of the current plant specific setpoint methodology.

The "as found" and "as left" values must also be recorded and reviewed for consistency with the assumptions of the surveillance interval extension analysis (Ref. 7) when applicable.

The Frequency of 92 days is justified in Reference 7.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.7

SR 3.3.2.7 is the performance of a SLAVE RELAY TEST. The SLAVE RELAY TEST is the energizing of the slave relays. Contact operation is verified in one of two ways. Actuation equipment that may be operated in the design mitigation mode is either allowed to function, or is placed in a condition where the relay contact operation can be verified without operation of the equipment. Actuation equipment that may not be operated in the design mitigation mode is prevented from operation by the SLAVE RELAY TEST circuit. For this latter case, contact operation is verified by a continuity check of the circuit containing the slave relay. This test is performed every 92 days. The Frequency is adequate, based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.8

SR 3.3.2.8 is the performance of a TADOT every 92 days. This test is a check of the Undervoltage RCP Function. The Function is tested up to, and including, the master relay coils.

The test also includes trip devices that provide actuation signals directly to the SSPS. The SR is modified by a Note that excludes verification of setpoints for relays. Relay setpoints require elaborate bench calibration and are verified during CHANNEL CALIBRATION. The Frequency is adequate. It is based on industry operating experience, considering instrument reliability and operating history data.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.9

SR 3.3.2.9 is the performance of a TADOT. This test is a check of the Manual Actuation Functions and P-4 Reactor Trip Interlock. It is performed every 18 months. Each Manual Actuation Function is tested up to, and including, the master relay coils. In some instances, the test includes actuation of the end device (i.e., pump starts, valve cycles, etc.). The Frequency is adequate, based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT. The Functions have no associated setpoints.

SR 3.3.2.10

SR 3.3.2.10 is the performance of a CHANNEL CALIBRATION.

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to measured parameter within the necessary range and accuracy.

CHANNEL CALIBRATIONS must be performed consistent with the assumptions of the plant specific setpoint methodology. The difference between the current "as found" values and the previous test "as left" values must be consistent with the drift allowance used in the setpoint methodology.

The Frequency of 18 months is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology.

This SR is modified by a Note stating that this test should include verification that the time constants are adjusted to the prescribed values where applicable.

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.2.11 and SR 3.3.2.12

These SRs ensure the individual channel ESF RESPONSE TIMES are less than or equal to the maximum values assumed in the accident analysis. Response Time testing acceptance criteria are included in the USFAR, Section 7.2, (Ref. 9). Individual component response times are not modeled in the analyses. The analyses model the overall or total elapsed time, from the point at which the parameter exceeds the Trip Setpoint value at the sensor, to the point at which the equipment reaches the required functional state (e.g., pumps at rated discharge pressure, valves in full open or closed position).

For channels that include dynamic transfer functions (e.g., lag, lead/lag, rate/lag, etc.), the response time test may be performed with the transfer functions set to one with the resulting measured response time compared to the appropriate UFSAR response time. Alternately, the response time test can be performed with the time constants set to their nominal value provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured.

Response time may be verified by actual response time tests in any series of sequential, overlapping or total channel measurements, or by the summation of allocated sensor, signal processing, and actuation logic response times with actual response time tests on the remainder of the channel. Allocations for sensor response times may be obtained from: (1) historical records based on acceptable response time tests (hydraulic, noise, or power interrupt tests), (2) inplace, onsite, or offsite (e.g., vendor) test measurements, or (3) utilizing vendor engineering specifications. Reference 8 provides the basis and methodology for using allocated sensor response times in the overall verification of the channel response time for specific sensors identified in the WCAP. Response time verification for other sensor types must be demonstrated by test.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The allocations for sensor response times must be verified prior to placing the component in operational service and re-verified following maintenance that may adversely affect response time. In general, electrical repair work does not impact response time provided the parts used for repair are of the same type and value. One example where response time could be affected is replacing the sensing assembly of a transmitter.

ESF RESPONSE TIME tests are conducted on an 18 month STAGGERED TEST BASIS with the exception of Function 6.d. Testing of the final actuation devices, which make up the bulk of the response time, is included in the testing of each channel. The final actuation device in one train is tested with each channel. Therefore, staggered testing results in response time verification of these devices every 18 months. Function 6.d is associated with the start of the motor-driven auxiliary feedwater pump only (Train A). Therefore, a Frequency of 18 months is specified. The 18 month Frequency is consistent with the typical refueling cycle and is based on plant operating experience, which shows that random failures of instrumentation components causing serious response time degradation, but not channel failure, are infrequent occurrences.

BASES

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REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 7.
3. UFSAR, Chapter 15.
4. IEEE-279-1971.
5. Technical Requirements Manual.
6. WCAP-12523, "RTS/ESFAS Setpoint Methodology Study," October 1990.
7. WCAP-10271-P-A, Supplement 2, Rev. 1, June 1990.
8. WCAP-13632 Revision 2, "Elimination of Pressure Sensor Response Time Testing Requirements," August 1995.
9. USFAR, Section 7.2.

BASES

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## B 3.3 INSTRUMENTATION

### B 3.3.3 Post Accident Monitoring (PAM) Instrumentation

#### BASES

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#### BACKGROUND

The primary purpose of the PAM instrumentation is to display unit variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Accidents (DBAs).

The OPERABILITY of the accident monitoring instrumentation ensures that there is sufficient information available on selected unit parameters to monitor and to assess unit status and behavior following an accident.

The availability of accident monitoring instrumentation is important so that responses to corrective actions can be observed and the need for, and magnitude of, further actions can be determined. These essential instruments are identified by plant specific documents (Ref. 1) addressing the recommendations of Regulatory Guide 1.97 (Ref. 2) as required by Supplement 1 to NUREG-0737 (Ref. 3).

The instrument channels required to be OPERABLE by this LCO include two classes of parameters identified during plant specific implementation of Regulatory Guide 1.97 as Type A and Category I variables.

Type A variables are included in this LCO because they provide the primary information required for the control room operator to take specific manually controlled actions for which no automatic control is provided, and that are required for safety systems to accomplish their safety functions for DBAs.



## BASES

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### BACKGROUND (continued)

Category I variables are the key variables deemed risk significant because they are needed to:

- Determine whether other systems important to safety are performing their intended functions;
- Provide information to the operators that will enable them to determine the likelihood of a gross breach of the barriers to radioactivity release; and
- Provide information regarding the release of radioactive materials to allow for early indication of the need to initiate action necessary to protect the public, and to estimate the magnitude of any impending threat.

These key variables are identified by the plant specific Regulatory Guide 1.97 analyses (Ref. 1) and are consistent with the current plant licensing basis. These analyses identify the plant specific Type A and Category I variables and provide justification for deviating from the requirements of Regulatory Guide 1.97.

The specific instrument Functions listed in Table 3.3.3-1 are discussed in the LCO section.

BASES

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APPLICABLE  
SAFETY ANALYSES

The PAM instrumentation ensures the operability of Regulatory Guide 1.97 Type A and Category I variables so that the control room operating staff can:

- Perform the diagnosis specified in the Emergency Operating Procedures (these variables are restricted to preplanned actions for the primary success path of DBAs), e.g., Loss Of Coolant Accident (LOCA);
- Take the specified, pre-planned, manually controlled actions, for which no automatic control is provided, and that are required for safety systems to accomplish their safety function;
- Determine whether systems important to safety are performing their intended functions;
- Determine the likelihood of a gross breach of the barriers to radioactivity release;
- Determine if a gross breach of a barrier has occurred; and
- Initiate action necessary to protect the public and to estimate the magnitude of any impending threat.

PAM instrumentation that meets the definition of Type A in Regulatory Guide 1.97 satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii). Selected Category I, non-Type A, instrumentation are included in Technical Specifications because it is intended to assist operators in minimizing the consequences of accidents. Therefore, Category I, non-Type A, variables are important for reducing public risk and satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

The PAM instrumentation LCO provides OPERABILITY requirements for Regulatory Guide 1.97 Type A instruments, which provide information required by the control room operators to perform certain manual actions specified in the Emergency Operating Procedures. These manual actions ensure that a system can accomplish its safety function, and are credited in the safety analyses. Additionally, this LCO addresses selected Regulatory Guide 1.97 instruments that have been designated Category I, non-Type A.

The OPERABILITY of the PAM instrumentation ensures there is sufficient information available on selected unit parameters to monitor and assess unit status following an accident. This capability is consistent with the recommendations of Reference 1.

LCO 3.3.3 requires two OPERABLE channels for most Functions. Two OPERABLE channels ensure no single failure prevents operators from getting the information necessary for them to determine the safety status of the unit, and to bring the unit to and maintain it in a safe condition following an accident.

Furthermore, OPERABILITY of two channels allows a CHANNEL CHECK during the post accident phase to confirm the validity of displayed information. More than two channels may be required if it is determined that failure of one accident monitoring channel results in information ambiguity (that is, the redundant displays disagree) that could lead operators to defeat or fail to accomplish a required safety function.

Table 3.3.3-1 lists all Type A and Category I variables identified by the plant specific Regulatory Guide 1.97 analyses, as amended by the NRC's SER (Ref. 1) with the exception of the containment spray add tank level.

Type A and Category I variables are required to meet Regulatory Guide 1.97 Category I design and qualification requirements for seismic and environmental qualification, single failure criterion, utilization of emergency standby power, immediately accessible display, continuous readout, and recording of display.

BASES

LCO (continued)

Listed below are discussions of the specified instrument Functions listed in Table 3.3.3-1.

1. Reactor Coolant System (RCS) Pressure (Wide Range)

RCS wide range pressure is a Category I variable provided for verification of core cooling and RCS integrity long term surveillance.

RCS pressure is used to verify delivery of Safety Injection (SI) flow to RCS from at least one train when the RCS pressure is below the pump shutoff head. RCS pressure is also used to verify closure of manually closed spray line valves and pressurizer Power Operated Relief Valves (PORVs).

In addition to these verifications, RCS pressure is used for determining RCS subcooling margin. RCS pressure can also be used:

- To determine whether to terminate actuated SI or to reinitiate stopped SI;
- To determine when to reset SI and shut off Emergency Core Cooling System (ECCS) pumps;
- To manually restart ECCS pumps;
- As Reactor Coolant Pump (RCP) trip criteria; and
- To make a determination on the nature of the accident in progress and where to go next in the procedure.

RCS subcooling margin is also used for unit stabilization and cooldown control.

BASES

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LCO (continued)

RCS pressure is also related to three decisions about depressurization. They are:

- To determine whether to proceed with primary system depressurization;
- To verify termination of depressurization; and
- To determine whether to close accumulator isolation valves during a controlled cooldown/depressurization.

A final use of RCS pressure is to determine whether to operate the pressurizer heaters.

RCS pressure is a Type A variable because the operator uses this indication to monitor the cooldown of the RCS following a Steam Generator Tube Rupture (SGTR) or small break LOCA. Operator actions to maintain a controlled cooldown, such as adjusting Steam Generator (SG) pressure or level, would use this indication. Furthermore, RCS pressure is one factor that may be used in decisions to terminate RCP operation.

2. 3. RCS Hot and Cold Leg Temperatures (Wide Range)

RCS Hot and Cold Leg Temperatures are Category I variables provided for verification of core cooling and long term surveillance.

RCS Hot and Cold Leg Temperatures may be used as a backup to determine RCS subcooling margin. RCS subcooling margin will allow termination of SI, if still in progress, or reinitiation of SI if it has been stopped. RCS subcooling margin is also used for unit stabilization and cooldown control.

In addition, RCS Cold Leg Temperature is used in conjunction with RCS hot leg temperature to verify the unit conditions necessary to establish natural circulation in the RCS.

BASES

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LCO (continued)

4. Steam Generator Water Level (Wide Range)

Wide Range SG water level is a Type A variable used to determine if an adequate heat sink is being maintained through the SGs for decay heat removal, primarily for the response to a loss of secondary heat sink event when the level is below the narrow range. The wide range SG level indication may also be used in conjunction with auxiliary feedwater flow for SI termination. In addition, the wide range level is cold calibrated and provides a complete range for monitoring SG level during a cooldown. Auxiliary feedwater flow provides a diverse indication for wide range SG water level. Four channels (one on each SG) are required to be OPERABLE.

5. Steam Generator Water Level (Narrow Range)

Narrow Range SG water level is a Type A variable used to determine if an adequate heat sink is being maintained through the SGs for decay heat removal and to maintain the SG level and prevent overfill. It is also used to determine whether SI should be terminated and may be used to diagnose an SG tube rupture event. Four channels (one on each SG) are required to be OPERABLE.

6. Pressurizer Water Level

Pressurizer Water Level is used to determine whether to terminate SI, if still in progress, or to reinitiate SI if it has been stopped. Knowledge of pressurizer water level is also used to verify the unit conditions necessary to establish natural circulation in the RCS and to verify that the unit is maintained in a safe shutdown condition.

BASES

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LCO (continued)

7. Containment Pressure (Wide Range)

Containment Pressure (Wide Range) is provided for verification of RCS and containment OPERABILITY.

Containment pressure is used to verify closure of Main Steam Isolation Valves (MSIVs), and containment spray Phase B isolation when High-3 containment pressure is reached.

8. Steam Line Pressure

Steam Line Pressure is a Type A variable provided for the following:

- Determining if a high energy secondary line break occurred and which steam generator is faulted;
- Maintaining an adequate heat sink;
- Verifying Auxiliary Feedwater flow to the faulted steam generator is isolated;
- Verifying operation of pressure control steam dump system;
- Maintaining the unit in a cold shutdown condition;
- Monitoring the RCS cooldown rate; and
- Providing diverse indication to Cold Leg temperature for natural circulation determination.

Two channels per steam line are required with sufficient accuracy to determine the faulted steam generator.

BASES

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LCO (continued)

9. Refueling Water Storage Tank (RWST) Level

The RWST Level is a Type A variable provided for verifying a water source to the ECCS and Containment Spray, determining the time for initiation of cold leg recirculation following a LOCA and event diagnosis.

The RWST level accuracy is established to allow an adequate supply of water to the Residual Heat Removal and Containment Spray pumps during the switchover to cold leg recirculation mode. A high degree of accuracy is required to maximize the time available to the operator to complete the switchover to the cold leg recirculation phase and ensure sufficient water is available to avoid losing pump suction.

10. Containment Floor Water Level (Wide Range)

Containment Floor Water Level is provided for verification and long term surveillance of RCS integrity.

Containment Floor Water Level is used to determine:

- Containment water level accident diagnosis;
- When cold leg recirculation can be implemented; and
- Whether to terminate SI, if still in progress.

11. Containment Area Radiation (High Range)

Containment Area Radiation is provided to monitor for the potential of significant radiation releases and to provide release assessment for use by operators in determining the need to invoke site emergency plans. Containment radiation level is used to determine if a High Energy Line Break has occurred, and whether the event is inside or outside of containment.



BASES

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LCO (continued)

12. Main Steam Line Radiation

The Main Steam Line Radiation level is a Type A variable provided to allow detection of gross secondary side radioactivity and to provide a means to identify the ruptured steam generator. Steam generator narrow range level serves as diverse indication for the one monitor per loop required.

13. Core Exit Temperature

Core Exit Thermocouples are used as a primary means to determine RCS subcooling margin. RCS subcooling margin will allow termination of SI, if still in progress, or reinitiation of SI if it has been stopped. RCS subcooling margin is also used for unit stabilization and cooldown control.

Core Exit Temperature is provided for verification and long term surveillance of core cooling.

An evaluation was made of the minimum number of valid Core Exit Thermocouples (CETCs) necessary for measuring core cooling. The evaluation determined the reduced complement of CETCs necessary to detect initial core recovery and trend the ensuing core heatup. The evaluations account for core nonuniformities, including incore effects of the radial decay power distribution, excore effects of condensate runback in the hot legs, and nonuniform inlet temperatures. Adequate core cooling is ensured with four CETCs per quadrant. Core Exit Temperature is used to determine whether to terminate SI, if still in progress, or to reinitiate SI if it has been stopped. Core Exit Temperature is also used for unit stabilization and cooldown control.

BASES

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LCO (continued)

14. Reactor Vessel Water Level

Reactor Vessel Water Level is provided for verification and long term surveillance of core cooling. It is also used for accident diagnosis and to determine reactor coolant inventory adequacy.

The Reactor Vessel Water Level Monitoring System provides a direct measurement of the liquid level above the fuel. Two channels are required OPERABLE (Train A and Train B). Each channel consists of eight sensors on a probe. For a channel to be considered OPERABLE one of the two sensors in the "head" region and three of the six sensors in the "plenum" region shall be OPERABLE. The level indicated by the OPERABLE sensors represents the amount of liquid mass that is in the reactor vessel above the core. Operability of each sensor may be determined by reviewing the error codes displayed on the control room indicator.

15. Hydrogen Monitors

Hydrogen Monitors are provided to detect high hydrogen concentration conditions that represent a potential for containment breach from a hydrogen explosion. This variable is also important in verifying the adequacy of mitigating actions.

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APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1, 2, and 3. In MODE 3, the hydrogen monitoring function is not required since the hydrogen production rate and the total hydrogen produced would be less than that calculated for the DBA LOCA. These variables are related to the diagnosis and pre-planned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1, 2, and 3. In MODES 4, 5, and 6, unit conditions are such that the likelihood of an event that would require PAM instrumentation is low; therefore, the PAM instrumentation is not required to be OPERABLE in these MODES.

## BASES

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### ACTIONS

Note 1 has been added in the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require unit shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to respond to an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

Note 2 has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.3-1. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

#### A.1

Condition A applies to all PAM Functions. Condition A addresses the situation where one or more Functions with one or more required channels are inoperable. The Required Action is to refer to Table 3.3.3-1 and to take the Required Actions for the Functions affected. The Completion Times are those from the reference Conditions and Required Actions.

#### B.1

If Condition B is required to be entered by Table 3.3.3-1, the inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel, the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

BASES

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ACTIONS (continued)

C.1

Condition C applies when the Required Action and associated Completion Time for Condition B are not met. This Required Action specifies the immediate initiation of actions in accordance with Specification 5.6.7, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

D.1 and E.1

Condition D applies to Functions with one required channel as required to be entered by Table 3.3.3-1. Required Action D.1 requires restoration of an inoperable channel within 7 days. Condition E applies to one or more Functions with two or more required inoperable channels on the same Function. Required Action E.1 requires all but one channel on the same Function be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with no required channels OPERABLE in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of the channel(s) limits the risk that the PAM Function will be in a degraded condition should an accident occur. Condition E is modified by a Note that excludes hydrogen monitor channels.

BASES

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ACTIONS (continued)

F.1

Condition F applies when two hydrogen monitor channels are inoperable. Required Action F.1 requires restoring one hydrogen monitor channel to OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable based on the backup capability of the Post Accident Sampling System to monitor the hydrogen concentration for evaluation of core damage and to provide information for operator decisions. Also, it is unlikely that a LOCA (which would cause core damage) would occur during this time.

G.1 and G.2

If the Required Action and associated Completion Time of Condition D, E, or F is not met, the unit must be brought to a MODE where the requirements of this LCO do not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours. Condition G is also modified by a Note that excludes Functions 11, 12, and 14. Required Action G.2 is modified by a Note that excludes Function 15 since the hydrogen monitors are only applicable in MODES 1 and 2.

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 plant systems.

BASES

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ACTIONS (continued)

H.1

If the Required Action and associated Completion Time of Condition D or E is not met, Required Action H.1 specifies the immediate initiation of actions in accordance with Specification 5.6.7. This Specification requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the low likelihood of unit conditions that would require information provided by this instrumentation. Condition H is modified by a Note that indicates that this Condition is only applicable to Functions 11, 12, and 14.

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SURVEILLANCE  
REQUIREMENTS

A Note has been added to the SR Table to clarify that SR 3.3.3.1 and SR 3.3.3.2 apply to each PAM instrumentation Function in Table 3.3.3-1.

SR 3.3.3.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation should be compared to similar instruments located throughout the plant.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including isolation, indication, and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE.

As specified in the SR, a CHANNEL CHECK is only required for those channels that are normally energized.

The Frequency of 31 days is based on operating experience that demonstrates that channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.3.2

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to measured parameter with the necessary range and accuracy. The CHANNEL CALIBRATION may consist of an electronic calibration of the channel for range decades above 10 R/h and a one point calibration check of the detector below 10 R/h with an installed or portable gamma source. For the hydrogen monitors, a CHANNEL CALIBRATION is performed using five gas samples which cover the range from zero volume percent hydrogen (100% N<sub>2</sub>) to > 20 volume percent hydrogen, balance nitrogen.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

This SR is modified by a Note that excludes the radiation detector for Function 11, Containment Area Radiation. For this Function, the CHANNEL CALIBRATION may consist of an electronic calibration of the remainder of the channel for range decades above 10 R/hr, and a one point calibration check of the detector below 10 R/hr with an installed or portable gamma source. Whenever a sensing element is replaced, the next required CHANNEL CALIBRATION of the CETC sensors, which may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel, is accomplished by an inplace cross calibration that compares the other sensing elements with the recently installed sensing element. The Frequency is based on operating experience and consistency with the typical industry refueling cycle.

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REFERENCES

1. Safety Evaluation Report, dated May 19, 1989.
2. Regulatory Guide 1.97, Revision 3, May 1983.
3. NUREG-0737, Supplement 1, "TMI Action Items."



BASES

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## B 3.3 INSTRUMENTATION

### B 3.3.4 Remote Shutdown System

#### BASES

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##### BACKGROUND

The Remote Shutdown System provides the control room operator with sufficient instrumentation that supports placing and maintaining the unit in a safe shutdown condition from a location other than the control room. This capability is necessary to protect against the possibility that the control room becomes inaccessible. A safe shutdown condition is defined as MODE 3. With the unit in MODE 3, the Auxiliary Feedwater (AF) System and the main steam safety valves or the Steam Generator (SG) Power Operated Relief Valves (PORVs) can be used to remove core decay heat and meet all safety requirements. The long term supply of water for the AF System and the ability to borate the Reactor Coolant System (RCS) from outside the control room allows extended operation in MODE 3.

If the control room becomes inaccessible, the operators can monitor the status for placing and maintaining the unit in MODE 3. The unit can be maintained safely in MODE 3 for an extended period of time.

The OPERABILITY of the remote shutdown instrumentation functions ensures there is sufficient information available on selected unit parameters to place and maintain the unit in MODE 3 should the control room become inaccessible.

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##### APPLICABLE SAFETY ANALYSES

The Remote Shutdown System is required to provide equipment at appropriate locations outside the control room with a capability to promptly shut down and maintain the unit in a safe condition in MODE 3.

The criteria governing the design and specific system requirements of the Remote Shutdown System are located in 10 CFR 50, Appendix A, GDC 19 (Ref. 1).

The Remote Shutdown System is considered an important contributor to the reduction of unit risk to accidents and as such it has been retained in the Technical Specifications as satisfying Criterion 4 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The Remote Shutdown System LCO provides the OPERABILITY requirements of the monitoring instrumentation necessary to place and maintain the unit in MODE 3 from a location other than the control room. The required instrumentation is listed in Table 3.3.4-1 in the accompanying LCO.

The monitoring instrumentation is required for:

- Core reactivity control (initial and long term);
- RCS pressure control;
- Decay heat removal via the AF System and the main steam safety valves or SG PORVs; and
- RCS inventory control via charging flow.

A Function of a Remote Shutdown System is OPERABLE if all instrument channels needed to support the Remote Shutdown System Function are OPERABLE. In some cases, Table 3.3.4-1 may indicate that the required information is available from several alternate sources. In these cases, the Function is OPERABLE as long as one channel of any of the alternate information sources is OPERABLE.

The remote shutdown monitoring instrument circuits covered by this LCO do not need to be energized to be considered OPERABLE. This LCO is intended to ensure the monitoring instruments will be OPERABLE if plant conditions require that the Remote Shutdown System be placed in operation.

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### APPLICABILITY

The Remote Shutdown System LCO is applicable in MODES 1, 2, and 3. This is required so that the unit can be placed and maintained in MODE 3 for an extended period of time from a location other than the control room.

This LCO is not applicable in MODE 4, 5, or 6. In these MODES, the facility is already subcritical and in a condition of reduced RCS energy. Under these conditions, considerable time is available to restore necessary instrument functions if control room instruments become unavailable.

## BASES

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### ACTIONS

Note 1 is included which excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require a unit shutdown. This exception is acceptable due to the low probability of an event requiring the Remote Shutdown System and because the equipment can generally be repaired during operation without significant risk of spurious trip.

Note 2 has been added to the ACTIONS to clarify the application of Completion Time rules. Separate Condition entry is allowed for each Function listed on Table 3.3.4-1. The Completion Time(s) of the inoperable channel(s)/train(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

#### A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System listed in Table 3.3.4-1 are inoperable.

The Required Action is to restore the required Function to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

#### B.1 and B.2

If the Required Action and associated Completion Time of Condition A is not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 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 plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.4.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined, based on a combination of the channel instrument uncertainties, including indication and readability. If the channels are within the criteria, it is an indication that the channels are OPERABLE. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

As specified in the Surveillance, a CHANNEL CHECK is only required for those channels which are normally energized. The Frequency of 31 days is based upon operating experience which demonstrates that channel failure is rare.

SR 3.3.4.2

CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency of 18 months is based upon operating experience and consistency with the typical industry refueling cycle.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 19.

## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.1 RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits

#### BASES

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##### BACKGROUND

These Bases address requirements for maintaining RCS pressure, temperature, and flow rate within limits assumed in the safety analyses. The safety analyses (Ref. 1) of normal operating conditions and anticipated operational occurrences assume initial conditions within the normal steady state envelope. The limits placed on RCS pressure, temperature, and flow rate ensure that the departure from nucleate boiling (DNB) will be met for each of the transients analyzed.

The RCS pressure limit is consistent with operation within the nominal operational envelope. Pressurizer pressure indications are averaged to come up with a value for comparison to the limit. A lower pressure will cause the reactor core to approach DNB limits.

The RCS coolant average temperature ( $T_{avg}$ ) limit is consistent with full power operation within the nominal operational envelope. Indications of temperature are averaged to determine a value for comparison to the limit. A higher average temperature will cause the core to approach DNB limits.

The RCS flow rate normally remains constant during an operational fuel cycle with all pumps running. The minimum RCS flow limit corresponds to that assumed for DNB analyses. Flow rate indications are averaged to come up with a value for comparison to the limit. A lower RCS flow will cause the core to approach DNB limits.

Operation for significant periods of time outside these DNB limits increases the likelihood of a fuel cladding failure in a DNB limited event.

BASES

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APPLICABLE  
SAFETY ANALYSES

The requirements of this LCO represent the initial conditions for DNB limited transients analyzed in the plant safety analyses (Ref. 1). The safety analyses have shown that transients initiated from the limits of this LCO will result in meeting the DNBR criterion of  $\geq 1.4$ . This is the acceptance limit for the RCS DNB parameters. Changes to the unit that could impact these parameters must be assessed for their impact on the DNB criteria. The transients analyzed for include loss of coolant flow events and dropped or stuck rod events. A key assumption for the analysis of these events is that the core power distribution is within the limits of LCO 3.1.6, "Control Bank Insertion Limits;" LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD);" and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

Safety Analyses assumed a value of 2207 psia (2192.3 psig). This value is bounded by the LCO value of 2219 psig assuming a measurement accuracy of less than 26.7 psi.

Safety Analyses assumed a value of 588.4°F for the vessel average temperature. In addition, the analyses assumed the calculated error (including the  $\pm 4^\circ\text{F}$  dead band for the rod control system) for the temperature is 8.74°F ( $2\sigma$  random error of 7.6°F plus the 1.14°F bias error). The value assumed in the non-Revised Thermal Design Procedure (non-RTDP) analyses is  $-8^\circ\text{F}$ ,  $+9.5^\circ\text{F}$ . For the RTDP analyses, a value of  $\pm 7.6^\circ\text{F}$  with a bias of  $+1.5^\circ\text{F}$  is assumed.

Safety Analyses assumed a total RCS flow rate of 358,800 gpm. This value is bounded by the LCO value of 371,400 gpm assuming a flow measurement uncertainty of 3.5%.

This 3.5% flow measurement uncertainty assumed in the analyses included errors from all sources including fouling in the venturi. The use of 3.5% flow error is acceptable if actual uncertainty is unknown. At the time analyses were performed, the flow accuracy was unavailable. Subsequent calculations determined the error to be less than 3.5%.

Any fouling that might bias the flow rate measurement greater than 0.1% can be detected by monitoring and trending various plant performance parameters. If detected, either the effect of the fouling shall be quantified and compensated for in the RCS flow rate measurement or the venturi shall be cleaned to eliminate the fouling.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The RCS DNB parameters satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

This LCO specifies limits on the monitored process variables—pressurizer pressure, RCS average temperature ( $T_{avg}$ ), and RCS total flow rate—to ensure the core operates within the limits assumed in the safety analyses. Operating within these limits will result in meeting the DNB design criterion in the event of a DNB limited transient.

A Note has been added to indicate the limit on pressurizer is not applicable during short term operational transients such as a THERMAL POWER ramp increase > 5% RTP per minute or a THERMAL POWER step increase > 10% RTP. These conditions represent short term perturbations where actions to control pressure variations might be counterproductive. Also, since they typically represent transients initiated from power levels < 100% RTP, an increased Departure from Nucleate Boiling Ratio (DNBR) margin exists to offset the temporary pressure variations.

Another set of limits on DNB related parameters is provided in SL 2.1.1, "Reactor Core SLs." LCO 3.4.1 represents the initial conditions of the safety analysis which are far more restrictive than the Safety Limit (SL). Should a violation of this LCO occur, the operator must check whether or not an SL may have been exceeded.

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APPLICABILITY

In MODE 1, the limits on pressurizer pressure, RCS coolant average temperature, and RCS total flow rate must be maintained during steady state operation in order to ensure DNB design criteria will be met in the event of an unplanned loss of forced coolant flow or other DNB limited transient. In all other MODES, the power level is low enough that DNB is not a concern.

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BASES

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ACTIONS

A.1

RCS pressure and RCS average temperature are controllable and measurable parameters. With one or both of these parameters not within LCO limits, action must be taken to restore parameter(s).

RCS total flow rate is not a controllable parameter and is not expected to vary during steady state operation. If the indicated RCS total flow rate is below the LCO limit, power must be reduced, as required by Required Action B.1, to restore DNB margin and eliminate the potential for violation of the accident analysis bounds.

The 2 hour Completion Time for restoration of the parameters provides sufficient time to adjust unit parameters, to determine the cause for the off normal condition, and to restore the readings within limits, and is based on plant operating experience.

B.1

If Required Action A.1 is not met within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 2 within 6 hours. In MODE 2, the reduced power condition eliminates the potential for violation of the accident analysis bounds. The Completion Time of 6 hours is reasonable to reach the required unit conditions in an orderly manner.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.1.1

Since Required Action A.1 allows a Completion Time of 2 hours to restore parameters that are not within limits, the 12 hour Surveillance Frequency for pressurizer pressure is sufficient to ensure the pressure can be restored to a normal operation, steady state condition following load changes and other expected transient operations. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess for potential degradation and to verify operation is within safety analysis assumptions.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.1.2

Since Required Action A.1 allows a Completion Time of 2 hours to restore parameters that are not within limits, the 12 hour Surveillance Frequency for RCS average temperature ( $T_{avg}$ ) is sufficient to ensure the temperature can be restored to a normal operation, steady state condition following load changes and other expected transient operations. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess for potential degradation and to verify operation is within safety analysis assumptions.

SR 3.4.1.3

The 12 hour Surveillance Frequency for RCS total flow rate is performed using the installed flow instrumentation. The required minimum RCS flow rate is met with  $\geq 95\%$  indicated flow rate. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess potential degradation and to verify operation within safety analysis assumptions.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.1.4

Measurement of RCS total flow rate by performance of a precision calorimetric heat balance once every 18 months allows the installed RCS flow instrumentation to be calibrated and verifies the actual RCS flow rate is greater than or equal to the minimum required RCS flow rate.

The Frequency of 18 months reflects the importance of verifying flow after a refueling outage when the core has been altered, which may have caused an alteration of flow resistance.

This SR is modified by a Note that allows entry into MODE 1, without having performed the SR, and placement of the unit in the best condition for performing the SR. The Note states that the SR is not required to be performed until 7 days after  $\geq 90\%$  RTP. This exception is appropriate since the heat balance requires the unit to be at a minimum of 90% RTP to obtain the stated RCS flow accuracies. The Surveillance shall be performed within 7 days after reaching 90% RTP.

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REFERENCES

1. UFSAR, Chapter 15.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.2 RCS Minimum Temperature for Criticality

BASES

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BACKGROUND

This LCO is based upon meeting several major considerations before the reactor can be made critical and while the reactor is critical.

The first consideration is Moderator Temperature Coefficient (MTC), LCO 3.1.3, "Moderator Temperature Coefficient (MTC)." In the transient and accident analyses, the MTC is assumed to be in a range from slightly positive to negative and the operating temperature is assumed to be within the nominal operating envelope while the reactor is critical. The LCO on minimum temperature for criticality helps ensure the unit is operated consistent with these assumptions.

The second consideration is the protective instrumentation. Because certain protective instrumentation (e.g., excore neutron detectors) can be affected by moderator temperature, a temperature value within the nominal operating envelope is chosen to ensure proper indication and response while the reactor is critical.

The third consideration is the pressurizer operating characteristics. The transient and accident analyses assume that the pressurizer is within its normal startup and operating range (i.e., saturated conditions and steam bubble present). It is also assumed that the RCS temperature is within its normal expected range for startup and power operation. Since the density of the water, and hence the response of the pressurizer to transients, depends upon the initial temperature of the moderator, a minimum value for moderator temperature within the nominal operating envelope is chosen.

The fourth consideration is that the reactor vessel is above its minimum nil ductility Reference temperature when the reactor is critical. This parameter is also assured through compliance with LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

BASES

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APPLICABLE  
SAFETY ANALYSES

Although the RCS minimum temperature for criticality is not itself an initial condition assumed in Design Basis Accidents (DBAs), the closely aligned temperature for Hot Zero Power (HZP) is a process variable that is an initial condition of DBAs, such as the Rod Cluster Control Assembly (RCCA) withdrawal, RCCA ejection, and main steam line break accidents performed at zero power that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier.

All low power safety analyses assume initial RCS loop temperatures greater than or equal to the HZP temperature of 557°F (Ref. 1). This minimum temperature for criticality limitation provides a small band, 7°F, for critical operation below HZP. This band allows critical operation below HZP during unit startup and does not adversely affect any safety analyses since the MTC is not significantly affected by the small temperature difference between HZP and the minimum temperature for criticality.

The RCS minimum temperature for criticality satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

Compliance with the LCO ensures that the reactor will not be made or maintained critical ( $k_{eff} \geq 1.0$ ) at a temperature less than a small band below the HZP temperature, which is assumed in the safety analysis. Failure to meet the requirements of this LCO may produce initial conditions inconsistent with the initial conditions assumed in the safety analysis.

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APPLICABILITY

In MODE 1 and MODE 2 with  $k_{eff} \geq 1.0$ , LCO 3.4.2 is applicable since the reactor can only be critical ( $k_{eff} \geq 1.0$ ) in these MODES.

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BASES

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APPLICABILITY (continued)

The special test exception of LCO 3.1.8, "MODE 2 PHYSICS TESTS Exceptions," permits PHYSICS TESTS to be performed at  $\leq 5\%$  RTP with RCS loop average temperatures slightly lower than normally allowed so that fundamental nuclear characteristics of the core can be verified. In order for nuclear characteristics to be accurately measured, it may be necessary to operate outside the normal restrictions of this LCO. For example, to measure the MTC at beginning of cycle, it is necessary to allow RCS loop average temperatures to fall below  $T_{no\ load}$ , which may cause RCS loop average temperatures to fall below the temperature limit of this LCO.

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ACTIONS

A.1

If the parameters that are outside the limit cannot be restored, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 2 with  $k_{eff} < 1.0$  within 30 minutes. Rapid reactor shutdown can be readily and practically achieved within a 30 minute period.

The Completion Time is reasonable, based on operating experience, to reach MODE 2 with  $k_{eff} < 1.0$  in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.2.1

RCS loop average temperature is required to be verified  $\geq 550^{\circ}\text{F}$  once every 12 hours. The SR to verify RCS loop average temperatures every 12 hours is frequent enough to prevent the inadvertent violation of the LCO and takes into account indications and alarms that are continuously available to the operator in the control room.

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REFERENCES

1. UFSAR, Section 15.0.3.
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BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.3 RCS Pressure and Temperature (P/T) Limits

#### BASES

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#### BACKGROUND

All components of the RCS are designed to withstand effects of cyclic loads due to system pressure and temperature changes. These loads are introduced by startup (heatup) and shutdown (cooldown) operations, power transients, and reactor trips. This LCO limits the pressure and temperature changes during RCS heatup and cooldown, within the design assumptions and the stress limits for cyclic operation.

The PTLR contains P/T limit curves for heatup, cooldown, Inservice Leak and Hydrostatic (ISLH) testing, and data for the maximum rate of change of reactor coolant temperature (Ref. 1).

Each P/T limit curve defines an acceptable region for normal operation. The usual use of the curves is operational guidance during heatup or cooldown maneuvering, when pressure and temperature indications are monitored and compared to the applicable curve to determine that operation is within the allowable region.

The LCO establishes operating limits that provide a margin to brittle failure of the reactor vessel and piping of the Reactor Coolant Pressure Boundary (RCPB). The vessel is the component most subject to brittle failure, and the LCO limits apply to the entire RCS (except the pressurizer). The limits do not apply to the pressurizer, which has different design characteristics and operating functions.

10 CFR 50, Appendix G (Ref. 2), requires the establishment of P/T limits for specific material fracture toughness requirements of the RCPB materials. Reference 2 requires an adequate margin to brittle failure during normal operation, anticipated operational occurrences, and system hydrostatic tests. It mandates the use of the American Society of Mechanical Engineers (ASME) Code, Section III, Appendix G (Ref. 3).



BASES

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BACKGROUND (continued)

The neutron embrittlement effect on the material toughness is reflected by increasing the Nil Ductility Reference Temperature ( $RT_{NDT}$ ) as exposure to neutron fluence increases.

The actual shift in the  $RT_{NDT}$  of the vessel material will be established periodically by removing and evaluating the irradiated reactor vessel material specimens, in accordance with ASTM E 185 (Ref. 4) and Appendix H of 10 CFR 50 (Ref. 5). The operating P/T limit curves will be adjusted, as necessary, based on the evaluation findings and the recommendations of Regulatory Guide 1.99 (Ref. 6).

The P/T limit curves are composite curves established by superimposing limits derived from stress analyses of those portions of the reactor vessel and head that are the most restrictive. At any specific pressure, temperature, and temperature rate of change, one location within the reactor vessel will dictate the most restrictive limit. Across the span of the P/T limit curves, different locations are more restrictive, and, thus, the curves are composites of the most restrictive regions.

The heatup curve represents a different set of restrictions than the cooldown curve because the directions of the thermal gradients through the vessel wall are reversed. The thermal gradient reversal alters the location of the tensile stress between the outer and inner walls during heatup and cooldown, respectively.

The criticality limit curve includes the Reference 2 requirement that it be  $\geq 40^{\circ}\text{F}$  above the heatup curve or the cooldown curve, and not less than the minimum permissible temperature for ISLH testing. However, the criticality curve is not operationally limiting; a more restrictive limit exists in LCO 3.4.2, "RCS Minimum Temperature for Criticality."

BASES

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BACKGROUND (continued)

The consequence of violating the LCO limits is that the RCS has been operated under conditions that can result in brittle failure of the RCPB, possibly leading to a nonisolable leak or loss of coolant accident. In the event these limits are exceeded, an evaluation must be performed to determine the effect on the structural integrity of the RCPB components. The ASME Code, Section XI, Appendix E (Ref. 7), provides a recommended methodology for evaluating an operating event that causes an excursion outside the limits.

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APPLICABLE  
SAFETY ANALYSES

The P/T limits are not derived from Design Basis Accident (DBA) analyses. They are prescribed during normal operation to avoid encountering pressure, temperature, and temperature rate of change conditions that might cause undetected flaws to propagate and cause nonductile failure of the RCPB, an unanalyzed condition. Reference 1 establishes the methodology for determining the P/T limits. Although the P/T limits are not derived from any DBA, the P/T limits are acceptance limits since they preclude operation in an unanalyzed condition.

RCS P/T limits satisfy Criterion 2 of  
10 CFR 50.36(c)(2)(ii).

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LCO

The two elements of this LCO are:

- a. The limit curves for heatup, cooldown, and ISLH testing; and
- b. Limits on the rate of change of temperature.

The LCO limits apply to all components of the RCS, except the pressurizer. These limits define allowable operating regions and permit a large number of operating cycles while providing a wide margin to nonductile failure.

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BASES

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LCO (continued)

The limits for the rate of change of temperature control the thermal gradient through the vessel wall and are used as inputs for calculating the heatup, cooldown, and ISLH testing P/T limit curves. Thus, the LCO for the rate of change of temperature restricts stresses caused by thermal gradients and also ensures the validity of the P/T limit curves.

Violating the LCO limits places the reactor vessel outside of the bounds of the stress analyses and can increase stresses in other RCPB components. The consequences depend on several factors, as follow:

- a. The severity of the departure from the allowable operating P/T regime or the severity of the rate of change of temperature;
- b. The length of time the limits were violated (longer violations allow the temperature gradient in the thick vessel walls to become more pronounced); and
- c. The existences, sizes, and orientations of flaws in the vessel material.

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APPLICABILITY

The RCS P/T limits LCO provides a definition of acceptable operation for prevention of nonductile failure in accordance with 10 CFR 50, Appendix G (Ref. 2). Although the P/T limits were developed to provide guidance for operation during heatup or cooldown (MODES 3, 4, and 5) or ISLH testing, their Applicability is at all times in keeping with the concern for nonductile failure. The Applicability includes MODE 6 and conditions with no fuel in the reactor vessel. This provides continued prevention of nonductile failure even while the reactor is "defueled" so that the RCS is acceptable for operation when fuel is returned to the reactor vessel. The limits do not apply to the pressurizer.

BASES

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APPLICABILITY (continued)

During MODES 1 and 2, other Technical Specifications provide limits for operation that can be more restrictive than or can supplement these P/T limits. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits;" LCO 3.4.2, "RCS Minimum Temperature for Criticality;" and Safety Limit 2.1, "Safety Limits;" also provide operational restrictions for pressure, temperature and maximum pressure. Furthermore, MODES 1 and 2 are above the temperature range of concern for nonductile failure, and stress analyses have been performed for normal maneuvering profiles, such as power ascension or descent.

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ACTIONS

A.1 and A.2

Operation outside the P/T limits during MODE 1, 2, 3, or 4, must be corrected so that the RCPB is returned to a condition that has been verified by stress analyses. The 30 minute Completion Time reflects the urgency of restoring the parameters to within the analyzed range. Most violations will not be severe, and the activity can be accomplished in this time in a controlled manner.

Besides restoring operation within limits, an engineering evaluation is required to determine if RCS operation can continue. The evaluation must verify the RCPB integrity remains acceptable and must be completed before continuing operation. Several methods may be used, including comparison with pre-analyzed transients in the stress analyses, new analyses, or inspection of the components.

For the vessel beltline only, ASME Code, Section XI, Appendix E (Ref. 7), may be used to support the evaluation.

The 72 hour Completion Time is reasonable to accomplish the evaluation. The evaluation for a mild violation is possible within this time, but more severe violations may require special, event specific stress analyses or inspections. A favorable evaluation must be completed before continuing to operate.

BASES

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ACTIONS (continued)

Condition A is modified by a Note requiring Required Action A.2 to be completed whenever the Condition is entered. The Note emphasizes the need to perform the evaluation of the effects of the excursion outside the allowable limits. Restoration alone per Required Action A.1 is insufficient because higher than analyzed stresses may have occurred and may have affected the RCPB integrity.

B.1 and B.2

If a Required Action and associated Completion Time of Condition A are not met, the unit must be placed in a lower MODE because either the RCS remained in an unacceptable P/T region for an extended period of increased stress or a sufficiently severe event caused entry into an unacceptable region. Either possibility indicates a need for more careful examination of the event, best accomplished with the RCS at reduced pressure and temperature. In reduced pressure and temperature conditions, the possibility of propagation with undetected flaws is decreased.

If the required restoration activity of Required Action A.1 cannot be accomplished within 30 minutes, Required Action B.1 and Required Action B.2 must be implemented to reduce pressure and temperature.

If the required evaluation for continued operation cannot be accomplished within 72 hours or the results are indeterminate or unfavorable, action must proceed to reduce pressure and temperature as specified in Required Action B.1 and Required Action B.2. A favorable engineering evaluation must be completed and documented before returning to operating pressure and temperature conditions.

Pressure and temperature are reduced by bringing the unit to MODE 3 within 6 hours and to 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 plant systems.

BASES

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ACTIONS (continued)

C.1 and C.2

Actions must be initiated immediately to correct operation outside of the P/T limits at times other than when in MODE 1, 2, 3, or 4, so that the RCPB is returned to a condition that has been verified by stress analysis. The immediate Completion Time reflects the urgency of initiating action to restore the parameters to within the analyzed range. Most violations will not be severe, and the activity can be accomplished in this time in a controlled manner.

Besides restoring operation within limits, an evaluation is required to determine if RCS operation can continue. The evaluation must verify that the RCPB integrity remains acceptable and must be completed prior to entry into MODE 4. Several methods may be used, including comparison with pre-analyzed transients in the stress analyses, or inspection of the components.

For the vessel beltline only, ASME Code, Section XI, Appendix E (Ref. 7), may be used to support the evaluation.

Condition C is modified by a Note requiring Required Action C.2 to be completed whenever the Condition is entered. The Note emphasizes the need to perform the evaluation of the effects of the excursion outside the allowable limits. Restoration alone per Required Action C.1 is insufficient because higher than analyzed stresses may have occurred and may have affected the RCPB integrity.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.3.1

Verification that operation is within the PTLR limits is required every 30 minutes when RCS pressure and temperature conditions are undergoing planned changes. This Frequency is considered reasonable in view of the control room indication available to monitor RCS status. Also, since temperature rate of change limits are specified in hourly increments, 30 minutes permits assessment and correction for minor deviations within a reasonable time.

Surveillance for heatup, cooldown, or ISLH testing may be discontinued when the definition given in the relevant plant procedure for ending the activity is satisfied.

This SR is modified by a Note that only requires this SR to be performed during system heatup, cooldown, and ISLH testing. This SR is not required during critical operations because the combination of LCO 3.4.2 establishing a lower bound and the Safety Limits establishing an upper bound will provide adequate controls to prevent a change in excess of 100°F prior to entry into the performance condition of heatup and cooldown operations.

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REFERENCES

1. WCAP-14040, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," June 1994.
2. 10 CFR 50, Appendix G.
3. ASME, Boiler and Pressure Vessel Code, Section III, Appendix G.
4. ASTM E 185-82, July 1982.
5. 10 CFR 50, Appendix H.
6. Regulatory Guide 1.99, Revision 2, May 1988.
7. ASME, Boiler and Pressure Vessel Code, Section XI, Appendix E.

## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.4 RCS Loops – MODES 1 and 2

#### BASES

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#### BACKGROUND

The primary function of the RCS is removal of the heat generated in the fuel due to the fission process, and transfer of this heat, via the Steam Generators (SGs), to the secondary plant.

The secondary functions of the RCS include:

- a. Moderating the neutron energy level to the thermal state, to increase the probability of fission;
- b. Improving the neutron economy by acting as a reflector;
- c. Carrying the soluble neutron poison, boric acid;
- d. Providing a second barrier against fission product release to the environment; and
- e. Removing the heat generated in the fuel due to fission product decay following a unit shutdown.

The reactor coolant is circulated through four loops connected in parallel to the reactor vessel, each containing an SG, a Reactor Coolant Pump (RCP), and appropriate flow and temperature instrumentation for both control and protection. The reactor vessel contains the clad fuel. The SGs provide the heat sink to the isolated secondary coolant. The RCPs circulate the coolant through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and prevent fuel damage. This forced circulation of the reactor coolant ensures mixing of the coolant for proper boration and chemistry control.



## BASES

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### APPLICABLE SAFETY ANALYSES

Safety analyses contain various assumptions for the design bases accident initial conditions including RCS pressure, RCS temperature, reactor power level, core parameters, and safety system setpoints. The important aspect for this LCO is the reactor coolant forced flow rate, which is represented by the number of RCS loops in service.

Both transient and steady state analyses have been performed to establish the effect of flow on the Departure from Nucleate Boiling (DNB). The transient and accident analyses for the plant have been performed assuming four RCS loops are in operation. The majority of the plant safety analyses are based on initial conditions at high core power or zero power. The accident analyses that are most important to RCP operation are the four pump coastdown, single pump locked rotor, single pump (broken shaft or coastdown), and rod withdrawal events (Ref. 1).

The Uncontrolled Rod Cluster Control Assembly Bank Withdrawal from a Subcritical or Low Power Startup Condition and the spectrum of Rod Cluster Control Assembly Ejection events were analyzed assuming only two of four RCPs in operation. This conservatively bounds operation in the lower modes. Analyzing these transients with only two RCPs in operation will result in a lower Departure from Nucleate Boiling Ratio (DNBR), thus producing more limiting results.

Steady state DNB analysis has been performed for the four RCS loop operation. For four RCS loop operation, the steady state DNB analysis, which generates the pressure and temperature Safety Limit (SL) (i.e., the DNBR limit) assumes a maximum power level of 118% RTP. This is the design overpower condition for four RCS loop operation. The value for the accident analysis setpoint of the nuclear overpower (high flux) trip is 109% RTP and is based on an analysis assumption that bounds possible instrumentation errors. The DNBR limit defines a locus of pressure and temperature points that result in a minimum DNBR greater than or equal to the critical heat flux correlation limit.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The unit is designed to operate with all RCS loops in operation to maintain DNBR above the SL, during all normal operations and anticipated transients. By ensuring heat transfer in the nucleate boiling region, adequate heat transfer is provided between the fuel cladding and the reactor coolant.

RCS Loops – MODES 1 and 2 satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The purpose of this LCO is to require an adequate forced flow rate for core heat removal. Flow is represented by the number of RCPs in operation for removal of heat by the SGs. To meet safety analysis acceptance criteria for DNB, four pumps are required at rated power.

An OPERABLE RCS loop consists of an OPERABLE RCP in operation providing forced flow for heat transport and an OPERABLE SG in accordance with the Steam Generator Tube Surveillance Program.

## BASES

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**APPLICABILITY** In MODES 1 and 2, the reactor is critical and thus has the potential to produce maximum THERMAL POWER. Thus, to ensure that the assumptions of the accident analyses remain valid, all RCS loops are required to be OPERABLE and in operation in these MODES to prevent DNB and core damage.

The decay heat production rate is much lower than the full power heat rate. As such, the forced circulation flow and heat sink requirements are reduced for lower, noncritical MODES as indicated by the LCOs for MODES 3, 4, and 5.

Operation in other MODES is covered by:

- LCO 3.4.5, "RCS Loops – MODE 3";
  - LCO 3.4.6, "RCS Loops – MODE 4";
  - LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
  - LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
  - LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
  - LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).
- 

## ACTIONS

### A.1

If the requirements of the LCO are not met, the Required Action is to reduce power and bring the unit to MODE 3. This lowers power level and thus reduces the core heat removal needs and minimizes the possibility of violating DNB limits.

The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging safety systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.4.1

This SR requires verification every 12 hours that each RCS loop is in operation. Verification may include flow rate, temperature, or pump status monitoring, which helps ensure that forced flow is providing heat removal while maintaining the margin to DNB. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS loop performance.

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REFERENCES

1. UFSAR, Chapter 15.

BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.5 RCS Loops – MODE 3

#### BASES

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#### BACKGROUND

In MODE 3, the primary function of the reactor coolant is removal of decay heat and transfer of this heat, via the Steam Generator (SG), to the secondary plant fluid. A secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

The reactor coolant is circulated through four RCS loops, connected in parallel to the reactor vessel, each containing an SG, a Reactor Coolant Pump (RCP), and appropriate flow, pressure, level, and temperature instrumentation for control, protection, and indication. The reactor vessel contains the clad fuel. The SGs provide the heat sink. The RCPs circulate the water through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and prevent fuel damage.

In MODE 3, RCPs are used to provide forced circulation for heat removal during heatup and cooldown. The MODE 3 decay heat removal requirements are low enough that a single RCS loop with one RCP running is sufficient to remove core decay heat. However, two RCS loops are required to be OPERABLE to ensure redundant capability for decay heat removal.

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#### APPLICABLE SAFETY ANALYSES

Whenever the Rod Control System is capable of rod withdrawal (i.e., the Reactor Trip Breakers (RTBs) are in the closed position and the Control Rod Drive Mechanisms (CRDMs) are energized) an inadvertent rod withdrawal from subcritical, resulting in a power excursion, is possible (Ref. 1). Such a transient could be caused by a malfunction of the rod control system. In addition, the possibility of a power excursion due to the ejection of an inserted control rod is possible with the breakers closed or open. Such a transient could be caused by the mechanical failure of a CRDM.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

Therefore, in MODE 3 with the Rod Control System capable of rod withdrawal, accidental control rod withdrawal from subcritical is postulated and requires at least two RCS loops to be OPERABLE and in operation to ensure that the accident analyses limits are met. For those conditions when the Rod Control System is not capable of rod withdrawal, two RCS loops are required to be OPERABLE, but only one RCS loop is required to be in operation to be consistent with MODE 3 accident analyses.

Failure to provide decay heat removal may result in challenges to a fission product barrier. The RCS loops are part of the primary success path that functions or actuates to prevent or 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.

RCS Loops – MODE 3 satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

The purpose of this LCO is to require that at least two RCS loops be OPERABLE. In MODE 3 with the Rod Control System capable of rod withdrawal, two RCS loops are required to be in operation due to the postulation of a power excursion because of an inadvertent control rod withdrawal. The required number of RCS loops in operation ensures that the Safety Limit criteria will be met for all of the postulated accidents.

When the Rod Control System is not capable of rod withdrawal, only one RCS loop in operation is necessary to ensure removal of decay heat from the core and homogenous boron concentration throughout the RCS. An additional RCS loop is required to be OPERABLE to provide backup forced flow capability.

BASES

LCO (continued)

The Note permits all RCPs to be removed from operation (i.e., not in operation) for  $\leq 1$  hour per 8 hour period. The purpose of the Note is to perform tests that are designed to validate various accident analyses values. One of these tests is validation of the pump coastdown curve used as input to a number of accident analyses including a loss of flow accident. This test is generally performed in MODE 3 during the initial startup testing program, and as such should only be performed once. If, however, changes are made to the RCS that would cause a change to the flow characteristics of the RCS, the input values of the coastdown curve must be revalidated by conducting the test again. Another test performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow.

The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits the stopping of the pumps in order to perform this test and validate the assumed analysis values. As with the validation of the pump coastdown curve, this test should be performed only once unless the flow characteristics of the RCS are changed. The 1 hour time period specified is adequate to perform the desired tests, and operating experience has shown that boron stratification is not a problem during this short period with no forced flow.

Utilization of the Note is permitted provided the following conditions are met, along with any other conditions imposed by procedures:

- a. No operations are permitted that would dilute the RCS boron concentration, thereby maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.



BASES

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LCO (continued)

An OPERABLE RCS loop consists of one OPERABLE RCP and one OPERABLE SG in accordance with the Steam Generator Tube Surveillance Program, which has the minimum water level specified in SR 3.4.5.2. An RCP is OPERABLE if it is capable of being powered and is able to provide forced flow if required.

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APPLICABILITY

In MODE 3, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. The most stringent condition of the LCO, that is, two RCS loops OPERABLE and two RCS loops in operation, applies to MODE 3 with the Rod Control System capable of rod withdrawal. The least stringent condition, that is, two RCS loops OPERABLE and one RCS loop in operation, applies to MODE 3 with the Rod Control System not capable of rod withdrawal.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops – MODES 1 and 2";
- LCO 3.4.6, "RCS Loops – MODE 4";
- LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";
- LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled";
- LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and
- LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

BASES

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ACTIONS

A.1

If the required RCS loop is not in operation, and the Rod Control System is capable of rod withdrawal, the Required Action is to place the Rod Control System in a condition incapable of rod withdrawal (e.g., disable all CRDMs by opening the RTBs or de-energizing the motor generator (MG) sets). When the Rod Control System is capable of rod withdrawal, it is postulated that a power excursion could occur in the event of an inadvertent control rod withdrawal. This mandates having the heat transfer capacity of two RCS loops in operation. If only one loop is in operation, the Rod Control System must be rendered incapable of rod withdrawal. The Completion Time of 1 hour to defeat the Rod Control System is adequate to perform these operations in an orderly manner without exposing the unit to risk for an undue time period.

B.1 and B.2

If no RCS loop is in operation with the Rod Control System not capable of rod withdrawal, except as permitted by the Note in the LCO section, all operations involving a reduction of RCS boron concentration must be suspended, and action to restore one RCS loop to operation must be immediately initiated. Boron dilution requires forced circulation for proper mixing.

The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must be continued until one loop is restored to operation.

## BASES

### ACTIONS (continued)

#### C.1, C.2, and C.3

If no RCS loop is in operation with the Rod Control System capable of rod withdrawal, except as permitted by the Note in the LCO section, or if the Required Action and associated Completion Time of Condition A are not met, action must be initiated to place the Rod Control System in a condition incapable of rod withdrawal (e.g., disable all CRDMs by opening the RTBs or de-energizing the MG sets). Additionally, all operations involving a reduction of RCS boron concentration must be suspended, and action to restore one of the RCS loops to operation must be immediately initiated. Boron dilution requires forced circulation for proper mixing, and disabling the CRDMs removes the possibility of an inadvertent rod withdrawal.

The immediate Completion Time reflects the importance of maintaining operation for heat removal. The action to restore must be continued until one loop is restored to operation.

#### D.1

If one required RCS loop is inoperable, redundancy for heat removal is lost. The Required Action is restoration of the required RCS loop to OPERABLE status within the Completion Time of 72 hours. This time allowance is a justified period to be without the redundant, nonoperating loop because a single loop in operation has a heat transfer capability greater than that needed to remove the decay heat produced in the reactor core and because of the low probability of a failure in the remaining loop occurring during this period.

#### E.1

If the Required Action and associated Completion Time of Condition D are not met, the unit must be brought to MODE 4. In MODE 4, the unit may be placed on the Residual Heat Removal System. The additional Completion Time of 12 hours is compatible with required operations to achieve cooldown and depressurization from the existing unit conditions in an orderly manner and without challenging plant systems.

## BASES

### ACTIONS (continued)

#### F.1, F.2, and F.3

If two required RCS loops are inoperable, action must be initiated to place the Rod Control System in a condition incapable of rod withdrawal (e.g., disable all CRDMs by opening the RTBs or de-energizing the MG sets). All operations involving a reduction of RCS boron concentration must be suspended, and action to restore one of the RCS loops to OPERABLE status must be initiated. Boron dilution requires forced circulation for proper mixing, and disabling the CRDMs removes the possibility of an inadvertent rod withdrawal. The immediate Completion Time reflects the importance of maintaining the capability for heat removal. The action to restore must be continued until one loop is restored to OPERABLE status.

### SURVEILLANCE REQUIREMENTS

#### SR 3.4.5.1

This SR requires verification every 12 hours that the required operating loops are in operation. Verification may include flow rate, temperature, and pump status monitoring, which helps ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS loop performance.

#### SR 3.4.5.2

SR 3.4.5.2 requires verification of required SG OPERABILITY. SG OPERABILITY is verified by ensuring that the secondary side narrow range water level is  $\geq 18\%$  for each required RCS loop. If the SG secondary side narrow range water level is  $< 18\%$ , the tubes may become uncovered and the associated loop may not be capable of providing the heat sink for removal of the decay heat. The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to a loss of SG level.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.5.3

Verification that the required RCPs are OPERABLE ensures that safety analyses limits are met. The requirement also ensures that an additional RCP can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power availability to the required RCP. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

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REFERENCES

UFSAR, Section 15.4.1.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.6 RCS Loops – MODE 4

BASES

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BACKGROUND

In MODE 4, the primary function of the reactor coolant is the removal of decay heat and the transfer of this heat to either the Steam Generator (SG) secondary side coolant or the component cooling water via the Residual Heat Removal (RHR) heat exchangers. The secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

In MODE 4, the reactor coolant is circulated through at least two of the four RCS loops connected in parallel to the reactor vessel, each loop containing an SG, a Reactor Coolant Pump (RCP), and appropriate flow, pressure, level, and temperature instrumentation for control, protection, and indication. The RCPs circulate the coolant through the reactor vessel and SGs at a sufficient rate to ensure proper heat transfer and to prevent boric acid stratification.

In MODE 4, RHR loops can be used in lieu of RCS loops to provide forced circulation. The intent of this LCO is to provide forced flow from at least one RCP or one RHR loop for decay heat removal and transport. The flow provided by one RCP loop or RHR loop is adequate for decay heat removal. The other intent of this LCO is to require that two paths be available to provide redundancy for decay heat removal.

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APPLICABLE  
SAFETY ANALYSES

In MODE 4, circulation of the reactor coolant increases the time available for mitigation of the accidental boron dilution event. The RCS and RHR loops provide this circulation.

RCS Loops – MODE 4 satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

The purpose of this LCO is to require that at least two loops be OPERABLE in MODE 4 and that one of these loops be in operation. The LCO allows the two loops that are required to be OPERABLE to consist of any combination of RCS loops and RHR loops. Any one loop in operation provides enough flow to remove the decay heat from the core with forced circulation. An additional loop is required to be OPERABLE to provide redundancy for heat removal.

Note 1 permits all RCPs and RHR pumps to be removed from operation for  $\leq 1$  hour per 8 hour period. The purpose of the Note is to permit tests that are designed to validate various accident analyses values. One of the tests performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow. The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits the stopping of the pumps in order to perform this test and validate the assumed analysis values. If necessary, this test may also be conducted after the initial startup testing program. The 1 hour time period is adequate to perform the test, and operating experience has shown that boron stratification is not a problem during this short period with no forced flow.

Utilization of Note 1 is permitted provided the following conditions are met along with any other conditions imposed by procedures:

- a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

BASES

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LCO (continued)

Note 2 requires that the secondary side water temperature of each SG be  $< 50^{\circ}\text{F}$  above each of the RCS cold leg temperatures before the start of an RCP with any RCS cold leg temperature  $\leq 350^{\circ}\text{F}$ . This restraint is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

An OPERABLE RCS loop comprises an OPERABLE RCP and an OPERABLE SG which has the minimum water level specified in SR 3.4.6.2.

Similarly for the RHR System, an OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RCPs and RHR pumps are OPERABLE if they are capable of being powered and are able to provide forced flow if required.

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APPLICABILITY

In MODE 4, this LCO ensures forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of either RCS or RHR provides sufficient circulation for these purposes. However, two loops consisting of any combination of RCS and RHR loops are required to be OPERABLE to provide adequate redundancy for decay heat removal.

Operation in other MODES is covered by:

- LCO 3.4.4, "RCS Loops - MODES 1 and 2";
- LCO 3.4.5, "RCS Loops - MODE 3";
- LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled";
- LCO 3.4.8, "RCS Loops - MODE 5, Loops Not Filled";
- LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation - High Water Level" (MODE 6); and
- LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation - Low Water Level" (MODE 6).



BASES

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ACTIONS

A.1 and A.2

If no loop is in operation, except during conditions permitted by the Note in the LCO section, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RCS or RHR loop to operation must be immediately initiated. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining operation for decay heat removal.

B.1 and B.2

If one required RCS or RHR loop is inoperable and only one required loop remains OPERABLE, the intended redundancy for heat removal is lost. Action must be initiated to restore a second RCS or RHR loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

If the one required OPERABLE loop is an RHR loop and if the required loop is not restored to OPERABLE status, the unit must be brought to MODE 5 within 24 hours. Bringing the unit to MODE 5 is a conservative action with regard to decay heat removal. With only one RHR loop OPERABLE, the intended redundancy for decay heat removal is lost and, in the event of a loss of the remaining RHR loop, it would be safer to initiate that loss from MODE 5 ( $\leq 200^{\circ}\text{F}$ ) rather than MODE 4 (200 to  $350^{\circ}\text{F}$ ). The Completion Time of 24 hours is a reasonable time, based on operating experience, to reach MODE 5 from MODE 4 in an orderly manner and without challenging plant systems.

C.1 and C.2

If no loop is OPERABLE, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RCS or RHR loop to OPERABLE status must be initiated. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining the capability for decay heat removal.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.6.1

This SR requires verification every 12 hours that the required operating RCS or RHR loop is in operation. Verification may include flow rate, temperature, or pump status monitoring, which helps ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS and RHR loop performance.

SR 3.4.6.2

SR 3.4.6.2 requires verification of required SG OPERABILITY. SG OPERABILITY is verified by ensuring that the secondary side narrow range water level is  $\geq 18\%$  for each required RCS loop. If the SG secondary side narrow range water level is  $< 18\%$ , the tubes may become uncovered and the associated loop may not be capable of providing the heat sink necessary for removal of decay heat. The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to the loss of SG level.

SR 3.4.6.3

Verification that the required pump is OPERABLE ensures that an additional RCS or RHR pump can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the required pump. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

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REFERENCES

None.

BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.7 RCS Loops – MODE 5, Loops Filled

#### BASES

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##### BACKGROUND

In MODE 5 with the RCS loops filled, the primary function of the reactor coolant is the removal of decay heat and transfer this heat either to the Steam Generator (SG) secondary side coolant via natural circulation (Ref. 1) or the component cooling water via the Residual Heat Removal (RHR) heat exchangers. While the principal means for decay heat removal is via the RHR System, the SGs via natural circulation are specified as a backup means for redundancy. Even though the SGs cannot produce steam in this condition, they are capable of being a heat sink due to their large contained volume of secondary water. As long as the SG secondary side water is at a lower temperature than the reactor coolant, heat transfer will occur. The rate of heat transfer is directly proportional to the temperature difference. The secondary function of the reactor coolant is to act as a carrier for soluble neutron poison, boric acid.

In MODE 5 with the RCS loops filled, the reactor coolant is circulated by means of two RHR loops connected to the RCS, each loop containing an RHR heat exchanger, an RHR pump, and appropriate flow and temperature instrumentation for control, protection, and indication. One RHR pump circulates the water through the RCS at a sufficient rate to prevent boric acid stratification.

The number of loops in operation can vary to suit the operational needs. The intent of this LCO is to provide forced flow from at least one RHR loop for decay heat removal and transport. The flow provided by one RHR loop is adequate for decay heat removal. The other intent of this LCO is to require that a second path be available to provide redundancy for heat removal.

The second path can be another OPERABLE RHR loop or two OPERABLE SGs to provide an alternate method for decay heat removal via natural circulation.

BASES

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APPLICABLE  
SAFETY ANALYSIS

In MODE 5, RCS circulation increases the time available for mitigation of an accidental boron dilution event. The RHR loops provide this circulation and have been identified as important contributors to risk reduction.

RCS Loops – MODE 5, Loops Filled, satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

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LCO

The purpose of this LCO is to require that at least one of the RHR loops be OPERABLE and in operation with an additional RHR loop OPERABLE or two SGs with secondary side water level  $\geq 18\%$ . One RHR loop provides sufficient forced circulation to perform the safety functions of the reactor coolant under these conditions. An additional RHR loop is required to be OPERABLE to meet single failure considerations. However, if the standby RHR loop is not OPERABLE, an acceptable alternate method is two SGs with their secondary side water levels  $\geq 18\%$ . Should the operating RHR loop fail, the SGs via natural circulation could be used to remove the decay heat.

Note 1 permits all RHR pumps to be removed from operation  $\leq 1$  hour per 8 hour period. The purpose of the Note is to permit tests designed to validate various accident analyses values. One of the tests performed during the startup testing program is the validation of rod drop times during cold conditions, both with and without flow. The no flow test may be performed in MODE 3, 4, or 5 and requires that the pumps be stopped for a short period of time. The Note permits stopping of the pumps in order to perform this test and validate the assumed analysis values. If changes are made to the RCS that would cause a change to the flow characteristics of the RCS, the input values must be revalidated by conducting the test again. The 1 hour time period is adequate to perform the test, and operating experience has shown that boron stratification is not likely during this short period with no forced flow.

BASES

LCO (continued)

Utilization of Note 1 is permitted provided the following conditions are met, along with any other conditions imposed by procedures:

- a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation; and
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction.

Note 2 allows one RHR loop to be inoperable for a period of  $\leq 2$  hours, provided that the other RHR loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop when such testing is safe and possible.

Note 3 requires that the secondary side water temperature of each SG be  $< 50^\circ\text{F}$  above each of the RCS cold leg temperatures before the start of a Reactor Coolant Pump (RCP) with an RCS cold leg temperature  $\leq 350^\circ\text{F}$ . This restriction is to prevent a low temperature overpressure event due to a thermal transient when an RCP is started.

Note 4 provides for an orderly transition from MODE 5 to MODE 4 during a planned heatup by permitting removal of RHR loops from operation when at least one RCS loop is in operation. This Note provides for the transition to MODE 4 where an RCS loop is permitted to be in operation and replaces the RCS circulation function provided by the RHR loops.

An OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required. An OPERABLE SG via natural circulation has greater than or equal to the minimum water level specified in SR 3.4.7.2 and is otherwise capable of providing the necessary heat sink via natural circulation.

## BASES

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**APPLICABILITY** In MODE 5 with RCS loops filled, this LCO requires forced circulation of the reactor coolant to remove decay heat from the core and to provide proper boron mixing. One loop of RHR provides sufficient circulation for these purposes. However, one additional RHR loop is required to be OPERABLE or the secondary side water level of at least two SGs is required to be  $\geq 18\%$ .

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops - MODES 1 and 2";  
LCO 3.4.5, "RCS Loops - MODE 3";  
LCO 3.4.6, "RCS Loops - MODE 4";  
LCO 3.4.8, "RCS Loops - MODE 5, Loops Not Filled";  
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation - High Water Level" (MODE 6); and  
LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation - Low Water Level" (MODE 6).

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## ACTIONS

### A.1 and A.2

If no required RHR loop is in operation, except during conditions permitted by Note 1, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RHR loop to operation must be immediately initiated. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining operation for decay heat removal.

### B.1 and C.1

If the required RHR loop is inoperable or the required SG(s) have secondary side water levels  $< 18\%$ , redundancy for heat removal is lost. Action must be initiated immediately to restore either the required RHR loop to OPERABLE status or to restore the required SG secondary side water level(s). The Required Actions will restore an available alternate heat removal path. The immediate Completion Times reflect the importance of maintaining the availability of two paths for heat removal.

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BASES

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ACTIONS (continued)

D.1, D.2.1, and D.2.2

If two required RHR loops are inoperable or the required RHR loop and one or both SG secondary side water levels are not within limit(s), all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RHR loop to operation must be immediately initiated or initiate action to restore required SG secondary side water level to within limits. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining operation for decay heat removal.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.7.1

This SR requires verification every 12 hours that the required operating RHR loop is in operation. Verification may include flow rate, temperature, or pump status monitoring, which helps ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RHR loop performance.

SR 3.4.7.2

Verifying that at least two SGs are OPERABLE by ensuring their secondary side narrow range water levels are  $\geq 18\%$  ensures an alternate decay heat removal method via natural circulation in the event that the second RHR loop is not OPERABLE. If both RHR loops are OPERABLE, this surveillance is not needed. The 12 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to the loss of SG level.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.7.3

Verification that a second RHR pump is OPERABLE, when required, ensures that an additional pump can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the RHR pump. If secondary side water level is  $\geq 18\%$  in at least two SGs, this surveillance is not needed. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

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REFERENCES

1. NRC Information Notice 95-35, "Degraded Ability of Steam Generators to Remove Decay Heat by Natural Circulation," August 28, 1995.

## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.8 RCS Loops – MODE 5, Loops Not Filled

#### BASES

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##### BACKGROUND

In MODE 5 with the RCS loops not filled, the primary function of the reactor coolant is the removal of decay heat generated in the fuel, and the transfer of this heat to the component cooling water via the Residual Heat Removal (RHR) heat exchangers. The Steam Generators (SGs) are not available as a heat sink when the loops are not filled. The secondary function of the reactor coolant is to act as a carrier for the soluble neutron poison, boric acid.

In MODE 5 with loops not filled, only RHR pumps can be used for coolant circulation. The number of pumps in operation can vary to suit the operational needs. The intent of this LCO is to provide forced flow from at least one RHR pump for decay heat removal and transport, and to require that two paths be available to provide redundancy for heat removal.

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##### APPLICABLE SAFETY ANALYSES

In MODE 5, RCS circulation increases the time available for mitigation of an accidental boron dilution event. The RHR loops provide this circulation and have been identified as important contributors to risk reduction. The flow provided by one RHR loop is adequate for heat removal and for boron mixing.

RCS loops in MODE 5, Loops Not Filled, satisfies Criterion 4 of 10 CFR 50.36.(c)(2)(ii).

BASES

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LCO

The purpose of this LCO is to require that at least two RHR loops be OPERABLE and one of these loops be in operation. An OPERABLE loop is one that has the capability of transferring heat from the reactor coolant at a controlled rate. Heat cannot be removed via the RHR System unless forced flow is used. A minimum of one running RHR pump meets the LCO requirement for one loop in operation. An additional RHR loop is required to be OPERABLE to meet single failure considerations.

Note 1 permits all RHR pumps to be removed from operation for  $\leq 1$  hour. Utilization of Note 1 is permitted provided the following conditions are met, along with any other conditions imposed by procedures:

- a. No operations are permitted that would dilute the RCS boron concentration, therefore maintaining the margin to criticality. Boron reduction is prohibited because a uniform concentration distribution throughout the RCS cannot be ensured when in natural circulation;
- b. Core outlet temperature is maintained at least 10°F below saturation temperature, so that no vapor bubble may form and possibly cause a natural circulation flow obstruction; and
- c. No draining operations are permitted that would further reduce the RCS water volume.

Note 2 allows one RHR loop to be inoperable for a period of  $\leq 2$  hours, provided that the other loop is OPERABLE and in operation. This permits periodic surveillance tests to be performed on the inoperable loop when these tests are safe and possible.

An OPERABLE RHR loop is comprised of an OPERABLE RHR pump capable of providing forced flow to an OPERABLE RHR heat exchanger. RHR pumps are OPERABLE if they are capable of being powered and are able to provide flow if required.

BASES

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APPLICABILITY      In MODE 5 with loops not filled, this LCO requires core heat removal and coolant circulation by the RHR System.

Operation in other MODES is covered by:

LCO 3.4.4, "RCS Loops – MODES 1 and 2";  
LCO 3.4.5, "RCS Loops – MODE 3";  
LCO 3.4.6, "RCS Loops – MODE 4";  
LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled";  
LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level" (MODE 6); and  
LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level" (MODE 6).

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ACTIONS

A.1 and A.2

If no RHR loop is in operation, except during conditions permitted by Note 1, all operations involving a reduction of RCS boron concentration must be suspended and action to restore one RHR loop to operation must be immediately initiated. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining operation for decay heat removal.

B.1

If only one RHR loop is OPERABLE, except during conditions permitted by Note 2, redundancy for decay heat removal is lost and action must be initiated immediately to restore a second loop to OPERABLE status. The immediate Completion Time reflects the importance of maintaining the availability of two paths for heat removal.

BASES

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ACTIONS (continued)

C.1 and C.2

If no required RHR loops are OPERABLE, all operations involving a reduction of RCS boron concentration must be suspended and action must be initiated immediately to restore an RHR loop to OPERABLE status. Boron dilution requires forced circulation to provide proper mixing and preserve the margin to criticality. The immediate Completion Times reflect the importance of maintaining the capability for heat removal.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.8.1

This SR requires verification every 12 hours that the required operating RHR loop is in operation. Verification may include flow rate, temperature, or pump status monitoring, which helps ensure that forced flow is providing heat removal. The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RHR loop performance.

SR 3.4.8.2

Verification that a second RHR pump is OPERABLE ensures that an additional pump can be placed in operation, if needed, to maintain decay heat removal and reactor coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the required pumps. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

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REFERENCES

None.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.9 Pressurizer

BASES

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BACKGROUND

The pressurizer provides a point in the RCS where liquid and vapor are maintained in equilibrium under saturated conditions for pressure control purposes to prevent bulk boiling in the remainder of the RCS. Key functions include maintaining required primary system pressure during steady state operation, and limiting the pressure changes caused by reactor coolant thermal expansion and contraction during normal load transients.

The pressure control components addressed by this LCO include the pressurizer water level, the required heaters, and their controls and Engineered Safety Features (ESF) power supplies. Pressurizer safety valves and pressurizer power operated relief valves are addressed by LCO 3.4.10, "Pressurizer Safety Valves," and LCO 3.4.11, "Pressurizer Power Operated Relief Valves (PORVs)," respectively.

The intent of the LCO is to ensure that a steam bubble exists in the pressurizer during MODES 1, 2, and 3 to minimize the consequences of potential overpressure transients. The presence of a steam bubble is consistent with analytical assumptions. Relatively small amounts of noncondensable gases can inhibit the condensation heat transfer between the pressurizer spray and the steam, and diminish the spray effectiveness for pressure control.

## BASES

### BACKGROUND (continued)

Electrical immersion heaters, located in the lower section of the pressurizer vessel, keep the water in the pressurizer at saturation temperature and maintain a constant operating pressure. A minimum required available capacity of pressurizer heaters ensures that the RCS pressure can be maintained. The capability to maintain and control system pressure is important for maintaining subcooled conditions in the RCS and ensuring the capability to remove core decay heat by either forced or natural circulation of reactor coolant. Unless adequate heater capacity is available, the hot, high pressure condition cannot be maintained indefinitely and still provide the required subcooling margin in the primary system. Inability to control the system pressure and maintain subcooling under conditions of natural circulation flow in the primary system could lead to a loss of single phase natural circulation and decreased capability to remove core decay heat.

The pressurizer heaters are powered from the non-Class 1E buses. The pressurizer heaters are non-safety related. Plant design includes a total heater capacity of 1800 kW that is divided into four groups, with separate controls for the proportional and backup groups. The non-Class 1E ESF buses servicing the pressurizer heaters can be powered from the Unit Auxiliary Transformer, the System Auxiliary Transformer (SAT), or the emergency diesel generator by closing the ESF to non-ESF crosstie breaker.

### APPLICABLE SAFETY ANALYSES

In MODES 1, 2, and 3, the LCO requirement for a steam bubble is reflected implicitly in the accident analyses. Safety analyses performed for lower MODES are not limiting. All analyses performed from a critical reactor condition assume the existence of a steam bubble and saturated conditions in the pressurizer. In making this assumption, the analyses neglect the small fraction of noncondensable gases normally present.

Safety analyses presented in the UFSAR (Ref. 1) do not take credit for pressurizer heater operation; however, an implicit initial condition assumption of the safety analyses is that the RCS is operating at normal pressure.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The maximum pressurizer water level limit which ensures that a steam bubble exists in the pressurizer satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii). Although the heaters are not specifically used in accident analysis, they provide the capability to maintain subcooling in the long term during loss of offsite power, as indicated in NUREG-0737 (Ref. 2), and thus, satisfy Criterion 4 of 10 CFR 50.36(c)(2)(ii).

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LCO

The LCO requirement for the pressurizer to be OPERABLE with a water volume  $\leq 1656$  cubic feet, which is equivalent to  $\leq 92\%$ , ensures that a steam bubble exists. Limiting the LCO maximum operating water level preserves the steam space for pressure control. The LCO has been established to ensure the capability to establish and maintain pressure control for steady state operation and to minimize the consequences of potential overpressure transients. Requiring the presence of a steam bubble is also consistent with analytical assumptions.

The LCO requires two groups of OPERABLE pressurizer heaters, each with a capacity  $\geq 150$  kW, capable of being powered from redundant ESF power supplied buses. Since the only safety function for pressurizer heaters is in a loss of offsite power condition, normal power is not required for OPERABILITY. The minimum heater capacity required is sufficient to maintain the RCS near normal operating pressure when accounting for heat losses through the pressurizer insulation. By maintaining the pressure near the operating conditions, a wide margin to subcooling can be obtained in the loops. The value of 150 kW is derived from generic evaluation of Westinghouse pressurizer heat loss calculations (Ref. 3).



## BASES

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**APPLICABILITY** The need for pressure control is most pertinent when core heat can cause the greatest effect on RCS temperature, resulting in the greatest effect on pressurizer level and RCS pressure control. Thus, applicability has been designated for MODES 1 and 2. The applicability is also provided for MODE 3. The purpose is to prevent solid water RCS operation during heatup and cooldown to avoid rapid pressure rises caused by normal operational perturbations, such as reactor coolant pump startup.

In MODES 1, 2, and 3, there is need to maintain the availability of pressurizer heaters, capable of being powered from an ESF power supply. In the event of a loss of offsite power, the initial conditions of these MODES give the greatest demand for maintaining the RCS in a hot pressurized condition with loop subcooling for an extended period. For MODE 4, 5, or 6, it is not necessary to control pressure (by heaters) to ensure loop subcooling for heat transfer when the Residual Heat Removal (RHR) System is in service, and therefore, the LCO is not applicable.

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## ACTIONS A.1, A.2, A.3, and A.4

Pressurizer water level control malfunctions or other plant evolutions may result in a pressurizer water level above the nominal upper limit, even with the unit at steady state conditions. In MODE 1 at > 10% RTP (P-7), the unit will trip since the upper limit of this LCO is the same as the Pressurizer Water Level-High Trip.

If the pressurizer water level is not within the limit, action must be taken to bring the plant to a MODE in which the LCO does not apply. To achieve this status, within 6 hours the unit must be brought to MODE 3, with all rods fully inserted and incapable of withdrawal. Additionally, the unit must be brought to MODE 4 within 12 hours. This takes the unit out of the applicable MODES.

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 plant systems.

BASES

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ACTIONS (continued)

B.1

If the required groups of pressurizer heaters are inoperable, restoration is required within 72 hours. The Completion Time of 72 hours is reasonable considering the anticipation that a demand caused by loss of offsite power would be unlikely in this period. Pressure control may be maintained during this time using the remaining pressurizer heater capability.

C.1 and C.2

If Required Action B.1 and its associated Completion Time are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 3 within 6 hours and to MODE 4 within 12 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.9.1

This SR requires that during steady state operation pressurizer level is maintained below the nominal upper limit to provide a minimum space for a steam bubble. The Surveillance is performed by observing the indicated level. The Frequency of 12 hours corresponds to verifying the parameter each shift. The 12 hour interval has been shown by operating practice to be sufficient to regularly assess level for any deviation and verify that operation is consistent with the safety analyses assumption of ensuring that a steam bubble exists in the pressurizer. Alarms are also available for early detection of abnormal level indications.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.9.2

The SR is satisfied when the power supplies are demonstrated to be capable of producing the minimum power and the associated pressurizer heaters are verified to be  $\geq 150$  kW. This is performed by energizing the heaters and measuring circuit current. The Frequency of 18 months is considered adequate to detect heater degradation and has been shown by operating experience to be acceptable.

SR 3.4.9.3

This Surveillance demonstrates that the heaters can be manually transferred from the normal non-ESF power supply to the ESF power supply and energized. The Frequency of 18 months is based on a typical fuel cycle and is consistent with similar verifications of ESF power supplies.

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REFERENCES

1. UFSAR, Chapter 15.
2. NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.
3. Westinghouse Owners Group Study, "Emergency Power Supply Requirements for the Pressurizer Heaters," transmitted via B. L. King to C. Reed, TMI-OG-83, September 26, 1979.

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.10 Pressurizer Safety Valves

BASES

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BACKGROUND

The pressurizer safety valves provide, in conjunction with the Reactor Protection System, overpressure protection for the RCS. The pressurizer safety valves are totally enclosed pop type, spring loaded, self actuated valves with backpressure compensation. The safety valves are designed to prevent the system pressure from exceeding the system Safety Limit (SL), 2735 psig, which is 110% of the design pressure.

Because the safety valves are totally enclosed and self actuating, they are considered independent components. The relief capacity for each valve, 420,000 lb/hr, is based on postulated overpressure transient conditions resulting from a complete loss of steam flow to the turbine. This event results in the maximum surge rate into the pressurizer, which specifies the minimum relief capacity for the safety valves. The discharge flow from the pressurizer safety valves is directed to the pressurizer relief tank. This discharge flow is indicated by an increase in temperature downstream of the pressurizer safety valves or increase in the pressurizer relief tank temperature or level.

Overpressure protection is required in MODES 1, 2, 3, 4, and 5; however, in MODES 4 and 5, and in MODE 6 with the reactor vessel head on, overpressure protection is provided by operating procedures and by meeting the requirements of LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

The upper and lower pressure limits are based on the  $\pm 1\%$  tolerance requirement (Ref. 1) for lifting pressures above 1000 psig. The lift setting is for the ambient conditions associated with MODES 1, 2, and 3. This requires either that the valves be set hot or that a correlation between hot and cold settings be established.

BASES

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BACKGROUND (continued)

The pressurizer safety valves are part of the primary success path and mitigate the effects of postulated accidents. OPERABILITY of the safety valves ensures that the RCS pressure will be limited to 110% of design pressure. The consequences of exceeding the American Society of Mechanical Engineers (ASME) pressure limit (Ref. 1) could include damage to RCS components, increased leakage, or a requirement to perform additional stress analyses prior to resumption of reactor operation.

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APPLICABLE  
SAFETY ANALYSES

All accident and safety analyses in the UFSAR (Ref. 2) that require safety valve actuation assume operation of three pressurizer safety valves to limit increases in RCS pressure. The overpressure protection analysis (Ref. 3) is also based on operation of three safety valves. Accidents that could result in overpressurization if not properly terminated include:

- a. Uncontrolled rod withdrawal from full power;
- b. Loss of reactor coolant flow;
- c. Loss of external electrical load;
- d. Loss of normal feedwater;
- e. Loss of all AC power to station auxiliaries;
- f. Locked rotor; and
- g. Feedwater line break.

Detailed analyses of the above transients are contained in Reference 2. Safety valve actuation is required in events c, d, and e (above) to limit the pressure increase. Compliance with this LCO is consistent with the design bases and accident analyses assumptions.

Pressurizer safety valves satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The three pressurizer safety valves are set to open at the RCS design pressure (2500 psia), and within the ASME specified tolerance, to avoid exceeding the maximum design pressure SL, to maintain accident analyses assumptions, and to comply with ASME requirements. The upper and lower pressure tolerance limits are based on the  $\pm 1\%$  tolerance requirements (Ref. 1) for lifting pressures above 1000 psig. The limit protected by this Specification is the Reactor Coolant Pressure Boundary (RCPB) SL of 110% of design pressure. Inoperability of one or more valves could result in exceeding the SL if a transient were to occur. The consequences of exceeding the ASME pressure limit could include damage to one or more RCS components, increased leakage, or additional stress analysis being required prior to resumption of reactor operation.

The Note allows entry into MODE 3 with the lift settings outside the LCO limits. This permits testing and examination of the safety valves at high pressure and temperature near their normal operating range, but only after the valves have had a preliminary cold setting. The cold setting gives assurance that the valves are OPERABLE near their design condition. Only one valve at a time will be removed from service for testing. The 54 hour exception is based on 18 hour outage time for each of the three valves. The 18 hour period is derived from operating experience that hot testing can be performed in this time frame.

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### APPLICABILITY

In MODES 1, 2, and 3, OPERABILITY of three valves is required because the combined capacity is required to keep reactor coolant pressure below 110% of its design value during certain accidents. MODE 3 is conservatively included, although the listed accidents may not require the safety valves for protection.

The LCO is not applicable in MODES 4 and 5, and in MODE 6 with the reactor vessel head on, because Low Temperature Overpressure Protection (LTOP) is provided. Overpressure protection is not required in MODE 6 with reactor vessel head detensioned.

BASES

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ACTIONS

A.1

With one pressurizer safety valve inoperable, restoration must take place within 15 minutes. The Completion Time of 15 minutes reflects the importance of maintaining the RCS Overpressure Protection System. An inoperable safety valve coincident with an RCS overpressure event could challenge the integrity of the pressure boundary.

B.1 and B.2

If Required Action A.1 and its associated Completion Time are not met or if two or more pressurizer safety valves are inoperable, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 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 plant systems. In MODE 4, overpressure protection is provided by the LTOP System. The change from MODE 1, 2, or 3 to MODE 4 reduces the RCS energy (core power and pressure), lowers the potential for large pressurizer insurges, and thereby removes the need for overpressure protection by three pressurizer safety valves.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.10.1

SRs are specified in the Inservice Testing Program. Pressurizer safety valves are to be tested in accordance with the requirements of Section XI of the ASME Code (Ref. 4), which provides the activities and Frequencies necessary to satisfy the SRs. No additional requirements are specified.

The pressurizer safety valve setpoint is  $\pm 1\%$  of a nominal 2485 psig.

BASES

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REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III.
2. UFSAR, Chapter 15.
3. WCAP-7769, Rev. 1, June 1972.
4. ASME, Boiler and Pressure Vessel Code, Section XI.



BASES

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B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.11 Pressurizer Power Operated Relief Valves (PORVs)

BASES

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BACKGROUND

The pressurizer is equipped with two types of devices for pressure relief: pressurizer safety valves and PORVs. The PORVs are air operated valves that are controlled to open at a specific set pressure when the pressurizer pressure increases and close when the pressurizer pressure decreases. The PORVs may also be manually operated from the control room.

Block valves, which are normally open, are located between the pressurizer and the PORVs. The block valves are used to isolate the PORVs in case of excessive leakage or a stuck open PORV. Block valve closure is accomplished manually using controls in the control room. A stuck open PORV is, in effect, a small break Loss Of Coolant Accident (LOCA). As such, block valve closure terminates the RCS depressurization and coolant inventory loss.

The PORVs and their associated block valves may be used by plant operators to depressurize the RCS to recover from certain transients if normal pressurizer spray is not available. Additionally, the series arrangement of the PORVs and their block valves permit performance of surveillances on the valves during power operation.

The PORVs may also be used for feed and bleed core cooling in the case of multiple equipment failure events that are not within the design basis, such as a total loss of feedwater.

The PORVs, their block valves, and their controls are powered from the vital buses that normally receive power from offsite power sources, but are also capable of being powered from emergency power sources in the event of a loss of offsite power. Two PORVs and their associated block valves are powered from two separate safety trains (Ref. 1).

BASES

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BACKGROUND (continued)

The unit has two PORVs, each having a relief capacity of 210,000 lb/hr at 2350 psia. The functional design of the PORVs is based on maintaining pressure below the Pressurizer Pressure-High reactor trip setpoint following a step reduction of 50% of full load with steam dump. In addition, the PORVs minimize challenges to the pressurizer safety valves and also may be used for Low Temperature Overpressure Protection (LTOP). See LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

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APPLICABLE  
SAFETY ANALYSES

Plant operators employ the PORVs to depressurize the RCS in response to certain unit transients if normal pressurizer spray is not available. For the Steam Generator Tube Rupture (SGTR) event, the safety analysis assumes that manual operator actions are required to mitigate the event. If a loss of offsite power is assumed to accompany the event, normal pressurizer spray is unavailable to reduce RCS pressure. The PORVs are assumed to be used for RCS depressurization, which is one of the steps performed to equalize the primary and secondary pressures in order to terminate the primary to secondary break flow and the radioactive releases from the affected steam generator.

The PORVs are also modeled in safety analyses for events that result in increasing RCS pressure for which Departure from Nucleate Boiling Ratio (DNBR) criteria are critical (Ref. 2). By assuming PORV actuation, the primary pressure remains below the high pressurizer pressure trip setpoint; thus, the DNBR calculation is more conservative. As such, this actuation is not required to mitigate these events, and PORV automatic operation is, therefore, not an assumed safety function.

Pressurizer PORVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The LCO requires the PORVs and their associated block valves to be OPERABLE for manual operation to mitigate the effects associated with an SGTR.

By maintaining two PORVs and their associated block valves OPERABLE, the single failure criterion is satisfied. An OPERABLE block valve may be either open, or closed and energized with the capability to be opened, since the required safety function is accomplished by manual operation. Although typically open to allow PORV operation, the block valves may be OPERABLE when closed to isolate the flow path of an inoperable PORV that is capable of being manually cycled (e.g. as in the case of excessive PORV leakage). Similarly, isolation of an OPERABLE PORV does not render that PORV or block valve inoperable provided the relief function remains available with manual action.

An OPERABLE PORV is required to be capable of manually opening and closing, and not experiencing excessive seat leakage. Excessive seat leakage, although not associated with a specific acceptance criteria, exists when conditions dictate closure of the block valve to limit leakage.

Satisfying the LCO helps minimize challenges to fission product barriers.

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### APPLICABILITY

In MODES 1, 2, and 3, the PORV and its block valve are required to be OPERABLE to limit the potential for a small break LOCA through the flow path. The most likely cause for a PORV small break LOCA is a result of a pressure increase transient that causes the PORV to automatically open. Imbalances in the energy output of the core and heat removal by the secondary system can cause the RCS pressure to increase to the PORV opening setpoint. The most rapid increases will occur at the higher operating power and pressure conditions of MODES 1 and 2. The PORVs are also required to be OPERABLE in MODES 1, 2, and 3 for manual actuation to mitigate a steam generator tube rupture event.

BASES

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APPLICABILITY (continued)

Pressure increases are less prominent in MODE 3 because the core input energy is reduced, but the RCS pressure is high. Therefore, the LCO is applicable in MODES 1, 2, and 3. The LCO is not applicable in MODE 4, 5, or 6, when both pressure and core energy are decreased and the pressure surges become much less significant. LCO 3.4.12 addresses the PORV requirements in MODES 4 and 5, and in MODE 6 with the reactor vessel head in place.

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ACTIONS

An ACTION Note 1 has been added to clarify that all pressurizer PORVs and block valves are treated as separate entities, each with separate Completion Times (i.e., the Completion Time is on a component basis). The exception for LCO 3.0.4, Note 2, permits entry into MODES 1, 2, and 3 to perform cycling of the PORVs or block valves to verify their OPERABLE status. Testing is not performed in lower MODES.

A.1

PORVs may be inoperable and capable of being manually cycled (e.g., excessive seat leakage). In this condition, either the PORVs must be restored or the flow path isolated within 1 hour. The associated block valve is required to be closed but power must be maintained to the associated block valve, since removal of power would render the block valve inoperable. This permits operation of the unit until the next refueling outage (MODE 6) so that maintenance can be performed on the PORVs to eliminate the problem condition.

Quick access to the PORV for pressure control can be made when power remains on the closed block valve. The Completion Time of 1 hour is based on plant operating experience that has shown that minor problems can be corrected or closure accomplished in this time period.

BASES

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ACTIONS (continued)

B.1. B.2 and B.3

If one PORV is inoperable and not capable of being manually cycled, it must be either restored, or isolated by closing the associated block valve and removing the power to the associated block valve. The Completion Times of 1 hour are reasonable, based on challenges to the PORVs during this time period, and provide the operator adequate time to correct the situation. If the inoperable valve cannot be restored to OPERABLE status, it must be isolated within the specified time. Because there is at least one PORV that remains OPERABLE, 72 hours is provided to restore the inoperable PORV to OPERABLE status. If the PORV cannot be restored within this time, the unit must be brought to a MODE in which the LCO does not apply, as required by Condition D.

C.1. and C.2

If one block valve is inoperable, then it is necessary to either restore the block valve to OPERABLE status within the Completion Time of 1 hour or place the associated PORV in manual control. The prime importance for the capability to close the block valve is to isolate a stuck open PORV. Therefore, if the block valve cannot be restored to OPERABLE status within 1 hour, the Required Action is to place the PORV in manual control (i.e., closed) to preclude its automatic opening for an overpressure event and to avoid the potential for a stuck open PORV at a time that the block valve is inoperable. The Completion Time of 1 hour is reasonable, based on the small potential for challenges to the system during this time period, and provides the operator time to correct the situation.

BASES

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ACTIONS (continued)

Because at least one PORV remains OPERABLE, the operator is permitted a Completion Time of 72 hours to restore the inoperable block valve to OPERABLE status. The time allowed to restore the block valve is based upon the Completion Time for restoring an inoperable PORV in Condition B, since the PORVs may not be capable of mitigating an event if the inoperable block valve is not full open. If the block valve is restored within the Completion Time of 72 hours, the power will be restored, and the PORV restored to OPERABLE status. If it cannot be restored within this additional time, the unit must be brought to a MODE in which the LCO does not apply, as required by Condition D.

D.1 and D.2

If the Required Action of Condition A, B, or C is not met, then the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 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. In MODE 4, 5, and 6 with the reactor vessel head on, automatic PORV OPERABILITY may be required. See LCO 3.4.12.

BASES

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ACTIONS (continued)

E.1 and E.2

If two PORVs are inoperable and not capable of being manually cycled, Condition B and its associated Required Actions would already be entered. The Required Actions would either restore at least one valve within the Completion Time of 1 hour or isolate the flow path by closing and removing the power to the associated block valves. The Completion Time of 1 hour is reasonable, based on the small potential for challenges to the system during this time and provides the operator time to correct the situation. If no PORVs are restored within the Completion Time, then the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 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 plant systems. In MODE 4, 5, and 6 with the reactor vessel head on, automatic PORV OPERABILITY may be required. See LCO 3.4.12.

F.1

If two block valves are inoperable, it is necessary to restore at least one block valve within 2 hours. The Completion Time is reasonable, based on the small potential for challenges to the system during this time and provide the operator time to correct the situation.

G.1 and G.2

If the Required Actions of Condition F are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 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 plant systems. In MODE 4, 5, and 6 with the reactor vessel head on, automatic PORV OPERABILITY may be required. See LCO 3.4.12.



BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be opened and closed if needed. The basis for the Frequency of 92 days is the ASME Code, Section XI (Ref. 3).

The Note modifies this SR by stating that it is not required to be met with the block valve closed in accordance with the Required Actions of this LCO. If the block valve is closed to isolate an inoperable PORV that is incapable of being manually cycled, the maximum Completion Time to restore the PORV and open the block valve is 72 hours, which is well within the allowable limits (25%) to extend the block valve Frequency of 92 days. Furthermore, these test requirements would be completed by the reopening of a recently closed block valve upon restoration of the PORV to OPERABLE status (i.e., completion of the Required Actions fulfills the SR).

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV. Operating a PORV through one complete cycle ensures that the PORV can be manually actuated for mitigation of an SGTR. The Frequency of 18 months is based on a typical refueling cycle and industry accepted practice.

The Note modifies the SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature and pressure conditions prior to entering MODE 1 or 2. In accordance with Reference 4, this test should be performed in MODE 3 or 4 to adequately simulate operating temperature and pressure effects on PORV operation.

SR 3.4.11.3

Operating the solenoid air control valves and check valves on the air accumulators ensures the PORV control system actuates properly when called upon. The Frequency of 18 months is based on a typical refueling cycle and the Frequency of the other Surveillances used to demonstrate PORV OPERABILITY.

BASES

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REFERENCES

1. Regulatory Guide 1.32, February 1977.
2. UFSAR, Section 15.2.
3. ASME, Boiler and Pressure Vessel Code, Section XI.
4. Generic Letter 90-06, "Resolution of Generic Issue 70, "Power Operated Relief Valve and Block Valve Reliability," and Generic Issue 94, "Additional Low Temperature Overpressure Protection for Light Water Reactors," pursuant to 10 CFR 50.54(f), June 25, 1990.

BASES

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## B 3.3 INSTRUMENTATION

### B 3.3.5 Loss Of Power (LOP) Diesel Generator (DG) Start Instrumentation

#### BASES

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#### BACKGROUND

The DGs provide a source of emergency power when offsite power is either unavailable or is insufficiently stable to allow safe unit operation. Undervoltage protection will generate an LOP start if a loss of voltage or degraded voltage condition occurs. There are two LOP start signals, one for each 4.16 kV ESF bus.

Two undervoltage relays with inverse time characteristics are provided on each 4.16 kV ESF bus for detecting a sustained degraded voltage condition or a loss of bus voltage. The relays are combined in a two-out-of-two logic to generate an LOP signal if the voltage is below 70% for a short time or below 95.8% for a long time. The LOP start actuation is described in UFSAR, Section 8.3 (Ref. 1).

#### Trip Setpoints and Allowable Values

Allowable Values provide a conservative margin with regards to instrument uncertainties to ensure analytical limits are not violated during anticipated operational occurrences and that the consequences of Design Basis Accidents (DBAs) will be acceptable providing the unit is operated from within the LCOs at the onset of the event and required equipment functions as designed.

BASES

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BACKGROUND (continued)

Trip Setpoints are the nominal values at which the relays are set. The actual nominal Trip Setpoint entered into the relay is more conservative than that specified by the Allowable Value to account for changes in random and non-random measurement errors. One example of such a change in measurement error is attributable to calculated normal uncertainties during the surveillance interval. Any relay is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION tolerance. If the measured value of a relay exceeds the Trip Setpoint but is within the Allowable Value, then the associated LOP DG Start Instrumentation function is considered OPERABLE. Trip Setpoints are specified in Reference 2.

---

APPLICABLE  
SAFETY ANALYSES

The LOP DG start instrumentation is required for the Engineered Safety Features (ESF) Systems to function in any accident with a loss of offsite power. Its design basis is that of the Engineered Safety Feature Actuation System (ESFAS).

Accident analyses credit the loading of the DG based on the loss of offsite power during a Loss Of Coolant Accident (LOCA). The actual DG start has historically been associated with the ESFAS actuation. The DG loading has been included in the delay time associated with each safety system component requiring DG supplied power following a loss of offsite power. The analyses assume a non-mechanistic DG loading, which does not explicitly account for each individual component of loss of power detection and subsequent actions.

The required channels of LOP DG start instrumentation, in conjunction with the ESF systems powered from the DGs, provide unit protection in the event of any of the analyzed accidents discussed in Reference 3, in which a loss of offsite power is assumed.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The delay times assumed in the safety analysis for the ESF equipment include the DG start delay, and the appropriate sequencing delay, if applicable. The response times for ESFAS actuated equipment in LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," include the appropriate DG loading and sequencing delay.

The LOP DG start instrumentation channels satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

---

LCO

The LCO for LOP DG start instrumentation requires that two channels per bus of both the loss of voltage and degraded voltage Functions shall be OPERABLE in MODES 1, 2, 3, and 4 when the LOP DG start instrumentation supports safety systems associated with the ESFAS. In MODES 5 and 6, the channels must be OPERABLE whenever the associated DG is required to be OPERABLE to ensure that the automatic start of the DG is available when needed. Loss of the LOP DG Start Instrumentation Function could result in the delay of safety systems initiation when required. This could lead to unacceptable consequences during accidents. During the loss of offsite power, DG A powers the motor driven auxiliary feedwater pump. Failure of this pump to start would leave only the diesel driven pump, as well as an increased potential for a loss of decay heat removal through the secondary system.

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APPLICABILITY

The LOP DG Start Instrumentation Functions are required in MODES 1, 2, 3, and 4 because ESF Functions are designed to provide protection in these MODES. Actuation in MODE 5 or 6 is required whenever the required DG must be OPERABLE so that it can perform its function on an LOP or degraded power to the vital bus.

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## BASES

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### ACTIONS

In the event a channel's Trip Setpoint is found nonconservative with respect to the Allowable Value, or the channel is found inoperable, then the function that channel provides must be declared inoperable and the LCO Condition entered for the particular protection function affected.

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered separately for each Function listed in the LCO on a per bus basis. The Completion Time(s) of the inoperable channel(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

#### A.1

Condition A applies to the LOP DG Start Instrumentation Function with one channel on one or more buses inoperable.

If one channel is inoperable, Required Action A.1 requires that channel to be placed in trip within 1 hour. With a channel in trip, the LOP DG Start Instrumentation channels are configured to provide a one-out-of-one logic to initiate an undervoltage or degraded voltage signal for that bus.

For the Loss of Voltage Function, a Note is added to allow bypassing an inoperable channel for up to 2 hours for surveillance testing of the other channel. This allowance is made where bypassing the channel does not cause an actuation.

The specified Completion Time is reasonable considering the low probability of an event occurring during these intervals.

#### B.1

Condition B applies to the LOP DG Start Instrumentation Function with two channels on one or more buses inoperable.

Required Action B.1 requires restoring one channel of the affected Function to OPERABLE status. The 1 hour Completion Time takes into account the low probability of an event requiring an LOP start occurring during this interval.

BASES

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ACTIONS (continued)

C.1

Condition C applies to each of the LOP DG Start Instrumentation Functions when the Required Action and associated Completion Time for Condition A or B are not met.

In these circumstances the Conditions specified in LCO 3.8.1, "AC Sources-Operating," or LCO 3.8.2, "AC Sources-Shutdown," for the DG made inoperable by failure of the LOP DG start instrumentation are required to be entered immediately. The actions of those LCOs provide for adequate compensatory actions to assure plant safety.

---

SURVEILLANCE  
REQUIREMENTS

SR 3.3.5.1

SR 3.3.5.1 is the performance of a TADOT. This test is performed every 31 days. The test checks trip devices that provide actuation signals directly, bypassing the analog process control equipment. The Frequency is based on the known reliability of the relays and controls and the multichannel redundancy available, and has been shown to be acceptable through operating experience. The SR is modified by a Note that excludes verification of relay setpoints during the TADOT.

SR 3.3.5.2

SR 3.3.5.2 is the performance of a CHANNEL CALIBRATION.

The setpoints, as well as the response to a loss of voltage and a degraded voltage test, shall include a single point verification that the trip occurs within the required time delay, as described in Reference 1.

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Frequency of 18 months is based on operating experience and consistency with the typical industry refueling cycle and is justified by the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

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REFERENCES

1. UFSAR, Section 8.3.
2. Technical Requirements Manual.
3. UFSAR, Chapter 15.

## B 3.3 INSTRUMENTATION

### B 3.3.6 Containment Ventilation Isolation Instrumentation

#### BASES

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#### BACKGROUND

Containment ventilation isolation instrumentation closes the containment isolation valves in the Minipurge System and the Normal Purge System. This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. A discussion of the containment ventilation system is provided in the Bases for LCO 3.6.3, "Containment Isolation Valves."

Containment ventilation isolation initiates on an automatic Safety Injection (SI) signal, by manual actuation of Phase A Isolation, by manual actuation of Phase B Isolation, or by a high radiation signal from RE-AR011 or RE-AR012. The Bases for LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation," discuss the ESFAS modes of initiation.

Two radiation monitoring channels (RE-AR011 and RE-AR012) provide input to the containment ventilation isolation. Each of the purge systems has inner and outer containment isolation valves in its supply and exhaust ducts. A high radiation signal from RE-AR011 initiates Train A containment ventilation isolation, which closes the inner containment isolation valves. A high radiation signal from RE-AR012 initiates Train B containment purge isolation, which closes the outer containment isolation valves.

The trip setpoint is established such that the actual submersion dose rate would not exceed 10 mR/hr in the containment building. The setpoint value may be increased up to twice the maximum concentration activity in containment determined by the sample analysis performed prior to each release provided the value does not exceed 10% of the limits determined by the Offsite Dose Calculation Manual.

BASES

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APPLICABLE  
SAFETY ANALYSES

The safety analyses assume that the containment remains intact with penetrations unnecessary for core cooling isolated early in the event (i.e., within approximately 60 seconds). The isolation of the purge valves has not been analyzed mechanistically in the dose calculations, although its rapid isolation is assumed. The containment ventilation isolation radiation monitors act as backup to the SI signal to ensure closing of the purge valves. They are also the primary means for automatically isolating containment in the event of a fuel handling accident. Containment isolation in turn ensures meeting the containment leakage rate assumptions of the safety analyses, and ensures that the calculated accidental offsite radiological doses are below 10 CFR 100 (Ref. 1) limits.

The containment ventilation isolation instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

The LCO requirements ensure that the instrumentation necessary to initiate Containment Ventilation Isolation, listed in Table 3.3.6-1, is OPERABLE.

1. Manual Initiation - Phase A

Refer to LCO 3.3.2, Function 3.a.1, for all initiating Functions and requirements.

2. Manual Initiation - Phase B

Refer to LCO 3.3.2, Function 3.b.1, for all initiating Functions and requirements.

BASES

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LCO (continued)

3. Automatic Actuation Logic and Actuation Relays

The LCO requires two trains of Automatic Actuation Logic and Actuation Relays OPERABLE to ensure that no single random failure can prevent automatic actuation.

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for Engineered Safety Feature Actuation System (ESFAS) Function 1.b, SI, ESFAS Function 3.a, Containment Phase A Isolation, and ESFAS Function 3.b, Containment Phase B Isolation. The applicable MODES and specified conditions for the containment ventilation isolation portion of these Functions are different and less restrictive than those for their Phase A isolation, Phase B isolation, and SI roles. If one or more of the SI, Phase A isolation, or Phase B isolation Functions becomes inoperable in such a manner that only the Containment Ventilation Isolation Function is affected, the Conditions applicable to their SI, Phase A isolation, and Phase B isolation Functions need not be entered. The less restrictive Actions specified for inoperability of the Containment Ventilation Isolation Functions specify sufficient compensatory measures for this case.

4. Containment Radiation

The LCO specifies two required channels to ensure that the radiation monitoring instrumentation necessary to initiate Containment Ventilation Isolation remains OPERABLE.

5. Safety Injection

Refer to LCO 3.3.2, Function 1, for all initiating Functions and requirements.

## BASES

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**APPLICABILITY** The Containment Ventilation Isolation Functions must be OPERABLE in MODES 1, 2, 3, and 4, and when Item C.2 of LCO 3.9.4 is required. Under these conditions, the potential exists for an accident that could release fission product radioactivity into containment. Therefore, the containment ventilation isolation instrumentation must be OPERABLE in these MODES.

While in MODES 5 and 6 without fuel handling in progress, or with a penetration closed by a manual or automatic isolation valve, blind flange, or equivalent, the containment ventilation isolation instrumentation need not be OPERABLE since the potential for radioactive releases is minimized and operator action is sufficient to ensure post accident offsite doses are maintained within the limits of Reference 1.

The Applicability for the containment ventilation isolation on the ESFAS Manual Initiation-Phase A, Manual Initiation-Phase B, and Safety Injection Functions are specified in LCO 3.3.2. Refer to the Bases for LCO 3.3.2 for discussion of the Manual Initiation-Phase A, Manual Initiation-Phase B, and Safety Injection Functions Applicabilities.

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**ACTIONS** The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by plant specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination is generally made during the performance of a COT, when the process instrumentation is set up for adjustment to bring it within specification. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

BASES

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ACTIONS (continued)

A Note has been added to the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.6-1. The Completion Time(s) of the inoperable channel(s)/train(s) of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

A.1

Condition A applies to the failure of one containment ventilation isolation radiation monitor channel. Condition A requires the inoperable channel to be restored to OPERABLE status within 4 hours. The Completion Time is justified by the low likelihood of events occurring during this interval, and recognition that the remaining channel will respond to most events.

B.1

Condition B applies to all Containment Ventilation Isolation Functions and addresses the train orientation of the Solid State Protection System (SSPS) and the master and slave relays for these Functions. It also addresses the failure of both radiation monitoring channels, or the inability to restore a single failed channel to OPERABLE status in the time allowed for Required Action A.1.

If one or both trains are inoperable, both radiation monitoring channels are inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action for the applicable Conditions of LCO 3.6.3 is met for each valve made inoperable by failure of isolation instrumentation.

Condition B is modified by a Note stating that the Condition is only applicable in MODE 1, 2, 3, or 4.

BASES

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ACTIONS (continued)

C.1 and C.2

Condition C applies to all Containment Ventilation Isolation Functions and addresses the train orientation of the SSPS and the master and slave relays for these Functions. It also addresses the failure of both radiation monitoring channels, or the inability to restore a single failed channel to OPERABLE status in the time allowed for Required Action A.1. If a train is inoperable, both channels are inoperable, or the Required Action and associated Completion Time of Condition A are not met, operation may continue as long as the Required Action to place and maintain containment purge valves in their closed position is met or the applicable Conditions of LCO 3.9.4, "Containment Penetrations," are met for each valve made inoperable by failure of isolation instrumentation. The Completion Time for these Required Actions is immediately.

A Note states that Condition C is only applicable when Item C.2 of LCO 3.9.4 is required.

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SURVEILLANCE  
REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.6-1 determines which SRs apply to which Containment Ventilation Isolation Functions.

SR 3.3.6.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.6.2

SR 3.3.6.2 is the performance of an ACTUATION LOGIC TEST. The train being tested is placed in the bypass condition, thus preventing inadvertent actuation. Through the semiautomatic tester, all possible logic combinations, with and without applicable permissives, are tested for each protection function. In addition, the master relay coil is tested for continuity. This verifies that the logic modules are OPERABLE and there is an intact voltage signal path to the master relay coils. This test is performed every 31 days on a STAGGERED TEST BASIS. The Surveillance interval is acceptable based on instrument reliability and industry operating experience.

SR 3.3.6.3

SR 3.3.6.3 is the performance of a MASTER RELAY TEST. The MASTER RELAY TEST is the energizing of the master relay, verifying contact operation and a low voltage continuity check of the slave relay coil. Upon master relay contact operation, a low voltage is injected to the slave relay coil. This voltage is insufficient to pick up the slave relay, but large enough to demonstrate signal path continuity. This test is performed every 31 days on a STAGGERED TEST BASIS. The Surveillance interval is acceptable based on instrument reliability and industry operating experience.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.6.4

A COT is performed every 92 days on each required channel to ensure the entire channel will perform the intended Function. The Frequency is based on the staff recommendation for increasing the availability of radiation monitors according to NUREG-1366 (Ref. 2). This test verifies the capability of the instrumentation to provide the containment ventilation system isolation. The setpoint shall be left consistent with the current plant specific calibration procedure tolerance.

SR 3.3.6.5

SR 3.3.6.5 is the performance of a SLAVE RELAY TEST. The SLAVE RELAY TEST is the energizing of the slave relays. Contact operation is verified in one of two ways. Actuation equipment that may be operated in the design mitigation mode is either allowed to function or is placed in a condition where the relay contact operation can be verified without operation of the equipment. Actuation equipment that may not be operated in the design mitigation mode is prevented from operation by the SLAVE RELAY TEST circuit. For this latter case, contact operation is verified by a continuity check of the circuit containing the slave relay. This test is performed every 92 days. The Frequency is acceptable based on instrument reliability and industry operating experience.

SR 3.3.6.6

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency is based on operating experience and is consistent with the typical industry refueling cycle.

BASES

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REFERENCES

1. 10 CFR 100.11.
2. NUREG-1366, December 1992.

BASES

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B 3.3 INSTRUMENTATION

B 3.3.7 Control Room Ventilation (VC) Filtration System Actuation  
Instrumentation

BASES

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**BACKGROUND**      The VC Filtration System provides an enclosed control room environment from which the unit can be operated following an uncontrolled release of radioactivity. During normal operation, the VC Filtration System provides control room ventilation. Upon receipt of an actuation signal, the VC Filtration System initiates filtered ventilation and pressurization of the control room. This system is described in the Bases for LCO 3.7.10, "Control Room Ventilation (VC) Filtration System."

The actuation instrumentation consists of two channels in each of the air intakes. A high radiation (gaseous) signal from one of two channels will initiate its associated train of the VC Filtration System. The VC Filtration System is also actuated by a Safety Injection (SI) signal. The SI Function is discussed in LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation."

---

**APPLICABLE  
SAFETY ANALYSES**      The control room must be kept habitable for the operators stationed there during accident recovery and post accident operations.

The VC Filtration System acts to terminate the supply of unfiltered outside air to the control room, initiate filtration, and pressurize the control room. These actions are necessary to ensure the control room is kept habitable for the operators stationed there during accident recovery and post accident operations by minimizing the radiation exposure of control room personnel.

In MODES 1, 2, 3, and 4, the radiation monitor actuation of the VC Filtration System provides a protected environment from which operators can control the unit following a Loss Of Coolant Accident or Steam Generator Tube Rupture.

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BASES

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APPLICABLE SAFETY ANALYSES (continued)

The radiation monitor actuation of the VC Filtration System in MODES 5 and 6, and during movement of irradiated fuel assemblies is the primary means to ensure control room habitability in the event of a fuel handling or other event which could provide a significant radioactive release.

The VC Filtration System actuation instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

---

LCO

The LCO requirements ensure that the control room air intake radiation-gaseous instrumentation necessary to initiate the VC Filtration System is OPERABLE. The LCO specifies two channels per train (ORE-PR031B and ORE-PR032B for Train A and ORE-PR033B and ORE-PR034B for Train B).

Refer to LCO 3.3.2, Function 1, for all initiating Functions and requirements for the SI instrumentation which actuates the VC Filtration System.

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APPLICABILITY

The VC Filtration System Functions must be OPERABLE in MODES 1, 2, 3, 4, and at all times during movement of irradiated fuel assemblies. The Functions must be OPERABLE in MODES 5 and 6 to provide protection from significant radioactivity releases.

The Applicability for the VC Filtration System actuation on the Engineered Safety Feature Actuation System (ESFAS) SI Functions are specified in LCO 3.3.2. Refer to the Bases for LCO 3.3.2 for discussion of the SI Function Applicability.

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## BASES

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### ACTIONS

The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by the plant specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination is generally made during the performance of a COT, when the process instrumentation is set up for adjustment to bring it within specification. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

#### A.1 and A.2

Condition A applies to the failure of one or more radiation channels in one VC Filtration System train. If one or more channels on one train is inoperable, one hour is permitted to either place the redundant VC Filtration System train in the normal mode of operation or to place one VC Filtration System train in the emergency mode of operation. The Completion Time of one hour is sufficient to ensure that the train operating in the normal mode is the train opposite from the train associated with the inoperable channel. An alternate action would be to place either train in the emergency mode. This accomplishes the actuation instrumentation Function and places the unit in a conservative mode of operation.

#### B.1

Condition B applies to the failure of one or more radiation channels in both VC Filtration System trains. If one or more channels on both trains are inoperable, one VC Filtration System train must be placed in the emergency mode of operation within 1 hour. This accomplishes the actuation instrumentation Function and places the unit in a conservative mode of operation.

BASES

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ACTIONS (continued)

C.1 and C.2

Condition C applies when the Required Action and associated Completion Time of Condition A or B have not been met and the unit is in MODE 1, 2, 3, or 4. The unit must be brought to a MODE in which the likelihood of an event requiring the VC Filtration System is minimized. To achieve this status, the unit must be brought to MODE 3 within 6 hours and 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 plant systems.

D.1

Condition D applies when the Required Action and associated Completion Time of Condition A or B have not been met when irradiated fuel assemblies are being moved. Movement of irradiated fuel assemblies must be suspended immediately to reduce the risk of accidents that would require VC Filtration System actuation.

E.1 and E.2

Condition E applies when the Required Action and associated Completion Time of Condition A or B have not been met in MODE 5 or 6. CORE ALTERATIONS must be suspended immediately and actions must be initiated immediately to restore the inoperable train(s) to OPERABLE status to provide protection from significant radioactivity releases.

BASES

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SURVEILLANCE  
REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.7-1 determines which SRs apply to which VC Filtration System Actuation Function.

SR 3.3.7.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.7.2

A COT is performed once every 92 days on each required channel to ensure the entire channel will perform the intended function. This test verifies the capability of the instrumentation to provide the VC Filtration System actuation. The setpoints shall be left consistent with the plant specific calibration procedure tolerance. The Frequency is based on the known reliability of the monitoring equipment and has been shown to be acceptable through operating experience.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.7.3

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency is based on operating experience and is consistent with the typical industry refueling cycle.

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REFERENCES

None.

B 3.3 INSTRUMENTATION

B 3.3.8 Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System  
Actuation Instrumentation

BASES

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BACKGROUND

The FHB Ventilation System ensures that radioactive materials in the fuel handling building atmosphere following a fuel handling accident are filtered and adsorbed prior to exhausting to the environment. The system is described in the Bases for LCO 3.7.13, "Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System." The system initiates filtered ventilation of the fuel handling building automatically following receipt of a high radiation signal or safety injection signal.

Two radiation monitoring channels (ORE-AR055 and ORE-AR056) provide input to the FHB Ventilation System isolation. A high radiation signal from ORE-AR055 initiates Train A FHB Ventilation System isolation. A high radiation signal from ORE-AR056 initiates Train B FHB Ventilation System isolation. High radiation detected by any monitor initiates fuel handling building isolation and starts the FHB Ventilation System. These actions function to prevent exfiltration of contaminated air by initiating filtered ventilation, which imposes a negative pressure on the fuel handling building.

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APPLICABLE  
SAFETY ANALYSES

The FHB Ventilation System ensures that radioactive materials in the fuel handling building atmosphere following a fuel handling accident are filtered and adsorbed prior to being exhausted to the environment. This action reduces the radioactive content in the fuel handling building exhaust following a fuel handling accident so that offsite doses remain within the limits specified in 10 CFR 100 (Ref. 1).

The FHB Ventilation System actuation instrumentation satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO                      The LCO requires two channels to ensure that the radiation monitoring instrumentation necessary to initiate the FHB Ventilation System remains OPERABLE.

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APPLICABILITY        High radiation initiation of the FHB Ventilation System must be OPERABLE during movement of irradiated fuel assemblies in the fuel handling building to ensure automatic initiation of the FHB Ventilation System when the potential for a fuel handling accident exists.

During movement of irradiated fuel assemblies or CORE ALTERATIONS with the containment equipment hatch not intact, the FHB Ventilation System actuation instrumentation is required to be OPERABLE to alleviate the consequences of an accident inside containment. The containment equipment hatch "not intact" refers to the requirement to have one door in the personnel air lock closed and the equipment hatch closed and held in place by a minimum of four bolts as described in the Bases for LCO 3.9.4, "Containment Penetrations."

While in MODES 1, 2, 3, 4, 5, and 6 without fuel handling in progress, the FHB Ventilation System instrumentation need not be OPERABLE since a fuel handling accident cannot occur.

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ACTIONS                The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by plant specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination is generally made during the performance of a COT, when the process instrumentation is set up for adjustment to bring it within specification. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

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BASES

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ACTIONS (continued)

A Note has been added to the ACTIONS to clarify the application of LCO 3.0.3. LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be sufficient reason to require a reactor shutdown.

A.1

Condition A applies to the failure of a single radiation monitor channel. If one channel is inoperable, a period of 7 days is allowed to restore it to OPERABLE status. The 7 day Completion Time is the same as is allowed if one train of the mechanical portion of the system is inoperable. The basis for this time is the same as that provided in LCO 3.7.13.

B.1, B.2.1, B.2.2, and B.2.3

Condition B applies if the Required Action or associated Completion Time of Condition A is not met or the failure of two radiation monitors. If the train cannot be restored to OPERABLE status, one FHB Ventilation System train must be immediately placed in the emergency mode. The FHB Ventilation System train placed in operation must be capable of being powered by an OPERABLE emergency power source. This accomplishes the actuation instrumentation function and places the unit in a conservative mode of operation.

BASES

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ACTIONS (continued)

Alternative actions may be taken if the FHB Ventilation System train is not placed in emergency mode or does not have an associated OPERABLE diesel generator. Required Action B.2.1 requires the suspension of fuel movement of irradiated fuel assemblies in the Fuel Handling Building, precluding a fuel handling accident. Required Actions B.2.2 and B.2.3 require the suspension of CORE ALTERATIONS and movement of irradiated fuel assemblies inside containment, precluding an accident that would require FHB Ventilation System actuation when the equipment hatch is not intact. These actions do not preclude the movement of fuel assemblies to a safe position.

Required Actions B.2.2 and B.2.3 are modified by a Note which indicates that these Required Actions are only required if the equipment hatch is not intact. If the hatch is intact, only Required Action B.2.1 is required.

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SURVEILLANCE  
REQUIREMENTS

A Note has been added to the SR Table to clarify that Table 3.3.8-1 determines which SRs apply to which Fuel Handling Building (FHB) Radiation Actuation Functions.

SR 3.3.8.1

Performance of the CHANNEL CHECK once every 12 hours ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Agreement criteria are determined, based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.8.2

A COT is performed once every 92 days on each required channel to ensure the entire channel will perform the intended function. This test verifies the capability of the instrumentation to provide the FHB Ventilation System actuation. The setpoints shall be left consistent with the plant specific calibration procedure tolerance. The Frequency of 92 days is based on the known reliability of the monitoring equipment and has been shown to be acceptable through operating experience.

SR 3.3.8.3

A CHANNEL CALIBRATION is performed every 18 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy. The Frequency is based on operating experience and is consistent with the typical industry refueling cycle.

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REFERENCES

1. 10 CFR 100.11.

BASES

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## B 3.3 INSTRUMENTATION

### B 3.3.9 Boron Dilution Protection System (BDPS)

#### BASES

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##### BACKGROUND

The primary purpose of the BDPS is to mitigate the consequences of the inadvertent addition of unborated primary grade water into the Reactor Coolant System (RCS) when the reactor is in a shutdown condition (i.e., MODES 3, 4, and 5).

The BDPS utilizes two channels of source range instrumentation. Each source range channel provides a signal to both trains of the BDPS. However, only one source range channel is required to be OPERABLE to support OPERABILITY of both BDPS trains. An internal microprocessor is used to record the counts per minute provided by these signals once per second. At the end of each minute, an algorithm compares the average counts per minute value (flux rate) of the 60 recorded readings for that 1 minute interval with the counts per minute value for the previous nine, 1 minute intervals. If the flux rate during a 1 minute interval is greater than or equal to twice the flux rate during any of the prior nine 1 minute intervals, the BDPS provides a signal to initiate mitigating actions.

Upon detection of a flux doubling by either source range instrumentation train, an alarm is sounded to alert the operator and valve movement is automatically initiated to terminate the dilution from the assumed dilution source. Valves that isolate the Refueling Water Storage Tank (RWST) are opened to supply borated water to the suction of the charging pumps, and valves which isolate the Volume Control Tank (VCT) are closed to terminate the assumed dilution.

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##### APPLICABLE SAFETY ANALYSES

The BDPS senses abnormal increases in source range counts per minute (flux rate) and actuates VCT and RWST valves to mitigate the consequences of an inadvertent boron dilution event as described in UFSAR, Chapter 15 (Ref. 1). The accident analyses rely on automatic BDPS actuation to mitigate the consequences of inadvertent boron dilution events.

The BDPS satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).



## BASES

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### LCO

LCO 3.3.9 provides the requirements for OPERABILITY of the BDPS that mitigate the consequences of a boron dilution event. Two redundant trains of BDPS are required to be OPERABLE to provide protection against single failure.

Because the BDPS utilizes the source range instrumentation as its detection system, the OPERABILITY of the detection system (i.e., control room indication, the flux doubling algorithm, the alarms, and signals to the various valves) for one Source Range Monitor (SRM) is also part of the OPERABILITY for each train in the system to be considered OPERABLE. Only one SRM is required for BDPS to be OPERABLE. Therefore, with no SRM capable of supporting the BDPS, both trains are inoperable.

Because the RWST is assumed to be a boration source, the RWST concentration required to satisfy the minimum required boron concentration for SHUTDOWN MARGIN of LCO 3.1.1, "SHUTDOWN MARGIN" must be maintained for BDPS OPERABILITY. Therefore, with the RWST boron concentration not satisfying these requirements, both trains of BDPS are inoperable.

The LCO is modified by a Note that allows the boron dilution flux doubling signal to be blocked during reactor startup in MODE 3. Blocking the flux doubling signal is acceptable during startup while in MODE 3, provided the reactor trip breakers are closed with the intent to withdraw rods for startup.

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### APPLICABILITY

The BDPS must be OPERABLE in MODES 3, 4, and 5 because the safety analysis identifies this system as the primary means to mitigate an inadvertent boron dilution of the RCS.

The BDPS OPERABILITY requirements are not applicable in MODES 1 and 2 because an inadvertent boron dilution would be terminated by a source range trip, a trip on the Power Range Neutron Flux-High, or Overtemperature  $\Delta T$ . These RTS Functions are discussed in LCO 3.3.1, "RTS Instrumentation."

In MODE 6, a dilution event is precluded by locked valves that isolate the RCS from the potential source of unborated water (refer to LCO 3.9.2, "Unborated Water Source Isolation Valves").

## BASES

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### ACTIONS

The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by the plant specific calibration procedure. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination of setpoint drift is generally made during the performance of a COT when the process instrumentation is set up for adjustment to bring it to within specification. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

The Actions are modified by a Note that allows the unborated water source isolation valves to be unisolated intermittently under administrative controls.

#### A.1

With one train of the BDPS OPERABLE, Required Action A.1 requires that the inoperable train must be restored to OPERABLE status within 72 hours. In this Condition, the remaining BDPS train is adequate to provide protection. The 72 hour Completion Time is based on the BDPS Function and is consistent with Engineered Safety Feature Actuation System Completion Times for loss of one redundant train. Also, the remaining OPERABLE train provides continuous indication of core power status to the operator, has an alarm function, and sends a signal to both trains of the BDPS to assure system actuation.

## BASES

### ACTIONS (continued)

#### B.1 and B.2

If the Required Action and associated Completion Time of Condition A is not met, the unborated water source isolation valves CV111B, CV8428, CV8441, CV8435, and CV8439 are required to be closed and secured within 1 hour to prevent the flow of unborated water into the RCS. The 1 hour Completion Time takes into consideration the time to close and secure open isolation valves. The isolation valves are also required to be verified closed and secured once every 31 days. The Completion Time of "once per 31 days" is appropriate considering the fact that the isolation valves are operated under administrative controls and the remaining OPERABLE train provides continuous indication of core power status to the operator, has an alarm function, and sends a signal to both trains of the BDPS to assure system actuation.

#### C.1

With two trains inoperable due to the RWST boron concentration being out of its required limits, valves CV112D and CV112E from the RWST are required to be closed and deactivated within 8 hours to prevent the flow of unborated water into the RCS. The 8 hour Completion Time takes into consideration the time required to restore boron concentration limits.

#### D.1, D.2, and D.3

With two trains inoperable for reasons other than Condition C, unborated water source isolation valves CV111B, CV8428, CV8441, CV8435, and CV8439 are required to be closed and secured within 1 hour to prevent the flow of unborated water into the RCS. The 1 hour Completion Time takes into consideration the time to close and secure open isolation valves. The isolation valves are also required to be verified closed and secured once every 12 hours. The Completion Time of "once per 12 hours" is appropriate considering the fact that the isolation valves are operated under administrative controls and confirms that the unborated water source isolation valves are in their correct position.

## BASES

### ACTIONS (continued)

With the required source range neutron flux monitor not capable of supporting the BDPS automatic function (e.g., when the source range neutron flux monitor count rate drops to < 10 cps), both BDPS trains are inoperable and Condition D is entered. Condition E may or may not also be entered, depending on whether the source range neutron flux monitor control room indication remains OPERABLE. When the source range neutron flux monitor is inoperable for control room monitoring of core status both trains of BDPS are inoperable and both Condition D and Condition E are entered.

Required Action D.2 accompanies Required Actions D.1 and D.3 to verify the SDM according to SR 3.1.1.1 within 1 hour and once per 12 hours thereafter. This action is intended to confirm that no unintended boron dilution has occurred while the BDPS was inoperable, and that the required SDM has been maintained. The specified Completion Time takes into consideration sufficient time for the initial determination of SDM and other information available in the control room related to SDM.

#### E.1

With no source range neutron flux monitor OPERABLE for control room monitoring of core status, both BDPS trains are inoperable and both Condition D and Condition E are entered. In this event, positive reactivity additions must be immediately suspended. This includes withdrawal of control or shutdown rods and intentional boron dilution.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.3.9.1, SR 3.3.9.2, and SR 3.3.9.3

These SRs require verification every 12 hours that at least one SRM signal to BDPS (OPERABLE control room indication may be used) is indicating at a count rate of  $\geq 10$  cps, one Reactor Coolant Pump is in operation, and the RCS loop isolation valves are open. Source Range cannot be relied on to indicate a proper rate of change below 10 cps due to instrument tolerances, externally induced electronic noise, and instrument sensitivity. Proper mixing of RCS coolant in the reactor cannot be assured with less than one Reactor Coolant Pump running. Without proper mixing, BDPS may be inadequate to recognize and terminate a dilution event. Having RCS isolation valves closed presents the possibility that the isolated loop represents a dilution source that is not analyzed.

The Frequency of 12 hours is sufficient considering other indications and alarms available to the operator in the control room to monitor RCS loop performance.

SR 3.3.9.1 is modified by a Note that provides a 4 hour delay in the requirement to perform this Surveillance for source range instrumentation when entering MODE 3 from MODE 2. This Note allows a shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3. This Surveillance must be performed prior to 4 hours after entry into MODE 3.

SR 3.3.9.4

Performance of the CHANNEL CHECK once every 12 hours ensures that gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Agreement criteria are determined by the unit staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit.

The Frequency is based on operating experience that demonstrates channel failure is rare. The CHANNEL CHECK supplements less formal, but more frequent, checks of channels during normal operational use of the displays associated with the LCO required channels.

SR 3.3.9.5

This SR requires verification, every 7 days, that the RWST boron concentration is greater than or equal to the equivalent SDM limit specified in the COLR. This verification provides added assurance that the RWST does not become an unborated water source or a source of borated water with an insufficient amount of boron such that when it is added to the RCS, it dilutes the RCS boron concentration below the SDM limits. This SR is not applicable when the RWST is isolated and not the primary source of makeup to the RCS.

SR 3.3.9.6

Verifying the correct alignment for manual, power operated, and automatic valves in the BDPS flow path provides assurance that the proper flow paths will exist for BDPS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those valves capable of potentially being mispositioned are in the correct position.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.9.7

This SR requires verification every 92 days that the BDPS alarm setpoint is less than or equal to an increase of twice the count rate within a 10 minute period. The Frequency of 92 days is sufficient since it is consistent with the Frequency of the COT.

SR 3.3.9.8

SR 3.3.9.8 requires the performance of a COT every 92 days, to ensure that each train of the BDPS and associated trip setpoints are fully operational. This test shall include verification that the boron dilution alarm setpoint is equal to or less than an increase of twice the count rate within a 10 minute period. The Frequency of 92 days is consistent with the requirements for source range channels in WCAP-10271-P-A (Ref. 2).

SR 3.3.9.8 is modified by a Note that provides a 4 hour delay in the requirement to perform this surveillance for source range instrumentation when entering MODE 3 from MODE 2. This Note allows a shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3. This surveillance must be performed within 4 hours after entry into MODE 3.

SR 3.3.9.9

These Surveillances demonstrate that valves CV112D and CV112E open and valves CV112B and CV112C close in  $\leq 30$  seconds on an actual or simulated BDPS Flux Doubling signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform these Surveillances under the conditions that apply during a unit outage and the potential for an unplanned unit transient if the Surveillances were performed with the reactor at power.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.9.10

SR 3.3.9.10 is the performance of a CHANNEL CALIBRATION every 18 months. CHANNEL CALIBRATION is a complete check of the instrument loop. This SR is modified by a Note stating that neutron detectors are excluded from a CHANNEL CALIBRATION. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

The Frequency is based on operating experience and consistency with the typical industry refueling cycle.

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REFERENCES

1. UFSAR, Chapter 15.
2. WCAP-10271-P-A, Supplement 2, Revision 1, June 1990.



BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.12 Low Temperature Overpressure Protection (LTOP) System

#### BASES

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##### BACKGROUND

The LTOP System controls RCS pressure at low temperatures so the integrity of the Reactor Coolant Pressure Boundary (RCPB) is not compromised by violating the pressure and temperature (P/T) limits of 10 CFR 50, Appendix G (Ref. 1). The reactor vessel is the limiting RCPB component for demonstrating such protection. The PTLR provides the maximum allowable actuation logic setpoints for the pressurizer Power Operated Relief Valves (PORVs) and the maximum RCS pressure for the existing RCS cold leg temperature during cooldown, shutdown, and heatup to meet the Reference 1 requirements during the MODES in which LTOP is necessary.

The reactor vessel material is less ductile at low temperatures than at normal operating temperature. As the vessel neutron exposure accumulates, the material toughness decreases and becomes less resistant to pressure stress at low temperatures (Ref. 2). RCS pressure, therefore, is maintained low at low temperatures and is increased only within the limits specified in the PTLR.

The potential for vessel overpressurization is most acute when the RCS is water solid, occurring only while shutdown; a pressure fluctuation can occur more quickly than an operator can react to relieve the condition. Exceeding the RCS P/T limits by a significant amount could cause brittle cracking of the reactor vessel. LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," requires administrative control of RCS pressure and temperature during heatup and cooldown to prevent exceeding the PTLR limits.

BASES

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BACKGROUND (continued)

This LCO provides RCS overpressure protection by having a minimum coolant input capability and having adequate pressure relief capacity. Limiting coolant input capability requires all Safety Injection (SI) pumps and all but one charging pump (a centrifugal charging pump) incapable of injection into the RCS and isolation of the SI accumulators. The pressure relief capacity requires either two redundant RCS relief valves or a depressurized RCS and an RCS vent of sufficient size. One RCS relief valve or the open RCS vent is the overpressure protection device that acts to terminate an increasing pressure event.

With minimum coolant input capability, the ability to provide core coolant addition is restricted. The LCO does not require the makeup control system deactivated or the SI actuation circuits blocked. Due to the lower pressures in the LTOP MODES and the expected core decay heat levels, the makeup system can provide adequate flow via the makeup control valve. If conditions require the use of more than one centrifugal charging pump for makeup in the event of loss of inventory, then pumps can be made available through manual actions.

The LTOP System for pressure relief consists of two PORVs with reduced lift settings, or two Residual Heat Removal (RHR) suction relief valves, or one PORV and one RHR suction relief valve, or a depressurized RCS and an RCS vent of sufficient size. Two RCS relief valves are required for redundancy. One RCS relief valve has adequate relieving capability to prevent overpressurization for the required coolant input capability.

BASES

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BACKGROUND (continued)

PORV Requirements

As designed for the LTOP System, each PORV is signaled to open if the RCS pressure approaches a limit determined by the LTOP actuation logic. The LTOP actuation logic monitors both RCS temperature and RCS pressure and determines when a condition not acceptable in the PTLR limits is approached. The wide range RCS temperature indications are auctioneered to select the lowest temperature signal.

The lowest temperature signal is processed through a function generator that calculates a pressure limit for that temperature. The calculated pressure limit is then compared with the indicated RCS pressure from a wide range pressure channel. If the indicated pressure meets or exceeds the calculated value, a PORV is signaled to open.

The PTLR presents the PORV setpoints for LTOP. The setpoints are normally staggered so only one valve opens during a low temperature overpressure transient. Having the setpoints of both valves within the limits in the PTLR ensures that the Reference 1 limits will not be exceeded in any analyzed event.

When a PORV is opened in an increasing pressure transient, the release of coolant will cause the pressure increase to slow and reverse. As the PORV releases coolant, the RCS pressure decreases until a reset pressure is reached and the valve is signaled to close. The pressure continues to decrease below the reset pressure as the valve closes.

BASES

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BACKGROUND (continued)

RHR Suction Relief Valve Requirements

During LTOP MODES, the RHR System is operated for decay heat removal and low pressure letdown control. Therefore, the RHR suction isolation valves are open in the piping from the RCS hot legs to the inlets of the RHR pumps. While these valves are open, the RHR suction relief valves are exposed to the RCS and are able to relieve pressure transients in the RCS.

The RHR suction isolation valves must be open to make the RHR suction relief valves OPERABLE for RCS overpressure mitigation. The RHR suction relief valves are spring loaded, bellows type water relief valves with pressure tolerances and accumulation limits established by Section III of the American Society of Mechanical Engineers (ASME) Code (Ref. 3) for Class 2 relief valves.

RCS Vent Requirements

Once the RCS is depressurized, a vent exposed to the containment atmosphere will maintain the RCS at containment ambient pressure in an RCS overpressure transient, if the relieving requirements of the transient do not exceed the capabilities of the vent. Thus, the vent path must be capable of relieving the flow resulting from the limiting LTOP mass or heat input transient, and maintaining pressure below the P/T limits. The required vent capacity may be provided by one or more vent paths.

For an RCS vent to meet the flow capacity requirement, it requires removing a pressurizer safety valve, removing a PORV's internals, and disabling its block valve in the open position, or similarly establishing any comparable vent. The vent path(s) must be above the level of reactor coolant, so as not to drain the RCS when open.

BASES

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APPLICABLE  
SAFETY ANALYSES

Safety analyses (Ref. 4) demonstrate that the reactor vessel is adequately protected against exceeding the Reference 1 P/T limits. In MODES 1, 2, and 3, the pressurizer safety valves will prevent RCS pressure from exceeding the Reference 1 limits. In MODE 4 and below, overpressure prevention falls to two OPERABLE RCS relief valves or to a depressurized RCS and a sufficient sized RCS vent. Each of these means has a limited overpressure relief capability.

The actual temperature at which the pressure in the P/T limit curve falls below the pressurizer safety valve setpoint increases as the reactor vessel material toughness decreases due to neutron embrittlement. Each time the PTLR curves are revised, the LTOP System must be re-evaluated to ensure its functional requirements can still be met using the RCS relief valve method or the depressurized and vented RCS condition.

The PTLR contains the acceptance limits that define the LTOP requirements. Any change to the RCS must be evaluated against the Reference 4 analyses to determine the impact of the change on the LTOP acceptance limits.

Transients that are capable of overpressurizing the RCS are categorized as either mass or heat input transients, examples of which follow:

Mass Input Type Transients

- a. Inadvertent safety injection; or
- b. Charging/letdown flow mismatch.

Heat Input Type Transients

- a. Inadvertent actuation of pressurizer heaters;
- b. Loss of RHR cooling; or
- c. Reactor Coolant Pump (RCP) startup with temperature asymmetry within the RCS or between the RCS and steam generators.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The following are required during the LTOP MODES to ensure that mass and heat input transients do not occur, which either of the LTOP overpressure protection means cannot handle:

- a. Rendering all SI pumps and all charging pumps but one centrifugal charging pump incapable of injection;
- b. Deactivating the accumulator discharge isolation valves in their closed positions; and
- c. Disallowing start of an RCP if secondary temperature is more than 50°F above primary temperature in any one loop. LCO 3.4.6, "RCS Loops-MODE 4," and LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled," provide this protection.

The Reference 4 analyses demonstrate that either one RCS relief valve or the depressurized RCS and RCS vent can maintain RCS pressure below limits when only one centrifugal charging pump is actuated. Thus, the LCO allows only one centrifugal charging pump OPERABLE during the LTOP MODES. Since none of the overpressure protection methods can handle the pressure transient need from accumulator injection, when RCS temperature is low, the LCO also requires the accumulators isolation when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in the PTLR. The isolated accumulators must have their discharge valves closed and the valve power supply breakers in their open positions.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

PORV Performance

The fracture mechanics analyses show that the vessel is protected when the PORVs are set to open at or below the limit shown in the PTLR. The setpoints are derived by analyses that model the performance of the LTOP System, assuming the limiting mass addition transient of one centrifugal charging pump injecting into a water solid RCS or the limiting heat input transient of the startup of an idle RCP with the secondary water in the steam generator  $\leq 50^{\circ}\text{F}$  above the RCS cold leg temperatures. These analyses consider pressure overshoot and undershoot beyond the PORV opening and closing, resulting from signal processing and valve stroke times. The PORV setpoints at or below the derived limit ensures the Reference 1 P/T limits will be met.

The PORV setpoints in the PTLR will be updated, as necessary, when the P/T limits are revised. The P/T limits are periodically modified as the reactor vessel material toughness decreases due to neutron embrittlement caused by neutron irradiation. Revised limits are determined using neutron fluence projections and the results of examinations of the reactor vessel material irradiation surveillance specimens. The Bases for LCO 3.4.3 discuss these examinations.

The PORVs are considered active components. Thus, the failure of one PORV is assumed to represent the worst case, single active failure.



BASES

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APPLICABLE SAFETY ANALYSES (continued)

RHR Suction Relief Valve Performance

The RHR suction relief valves do not have variable pressure and temperature lift setpoints like the PORVs. Analyses must show that one RHR suction relief valve with a setpoint  $\leq 450$  psig will pass flow greater than that required for the limiting LTOP transient while maintaining RCS pressure less than the P/T limit curve. Assuming all relief flow requirements during the limiting LTOP event, an RHR suction relief valve will maintain RCS pressure to within the valve rated lift setpoint, plus an accumulation  $\leq 10\%$  of the rated lift setpoint.

As the RCS P/T limits are decreased to reflect the loss of toughness in the reactor vessel materials due to neutron embrittlement, the RHR suction relief valves must be analyzed to still accommodate the design basis transients for LTOP.

The RHR suction relief valves are considered active components. Thus, the failure of one valve is assumed to represent the worst case single active failure.

RCS Vent Performance

With the RCS depressurized, analyses show a vent size of 2.0 square inches is capable of mitigating the allowed LTOP overpressure transient. The capacity of a vent this size is greater than the flow of the limiting transients for the LTOP configuration, maintaining RCS pressure less than the maximum pressure on the P/T limit curve.

The RCS vent size will be re-evaluated for compliance each time the P/T limit curves are revised based on the results of the vessel material surveillance.

The RCS vent is passive and is not subject to active failure.

The LTOP System satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

This LCO requires that the LTOP System is OPERABLE. The LTOP System is OPERABLE when the minimum coolant input and pressure relief capabilities are OPERABLE. Violation of this LCO could lead to the loss of low temperature overpressure mitigation capability and violation of the Reference 1 limits as a result of an operational transient.

To limit the coolant input capability, the LCO requires no SI pumps and a maximum of one charging pump (centrifugal) be capable of injecting into the RCS, and all accumulator discharge isolation valves be closed and de-energized (when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in the PTLR).

The LCO is modified by a note that permits the operation in MODE 4 with all SI pumps and charging pumps capable of RCS injection whenever all RCS cold legs exceed 330°F. This is necessary to allow transition between MODES 3 and 4.

The elements of the LCO that provide low temperature overpressure mitigation through pressure relief are:

- a. Two OPERABLE PORVs;
- b. Two OPERABLE RHR suction relief valves;
- c. One OPERABLE PORV and one OPERABLE RHR suction relief valve; or
- d. A depressurized RCS and an OPERABLE RCS vent.

A PORV is OPERABLE for LTOP when its block valve is open, its lift setpoint is set to the limit required by the PTLR and testing proves its ability to open at this setpoint, and motive power is available to the two valves and their control circuits.

An RHR suction relief valve is OPERABLE for LTOP when its RHR suction isolation valves are open, its setpoint is  $\leq 450$  psig, and testing has proven its ability to open at this setpoint.

BASES

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LCO (continued)

An RCS vent is OPERABLE when open with an area of  $\geq 2.0$  square inches.

Each of these methods of overpressure prevention is capable of mitigating the limiting LTOP transient.

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APPLICABILITY

This LCO is applicable in MODES 4 and 5, and in MODE 6 when the reactor vessel head is on. The pressurizer safety valves provide overpressure protection that meets the Reference 1 P/T limits above 350°F. When the reactor vessel head is off, overpressurization cannot occur.

LCO 3.4.3 provides the operational P/T limits for all MODES. LCO 3.4.10, "Pressurizer Safety Valves," requires the OPERABILITY of the pressurizer safety valves that provide overpressure protection during MODES 1, 2, and 3.

Low temperature overpressure prevention is most critical during shutdown when the RCS is water solid, and a mass or heat input transient can cause a very rapid increase in RCS pressure resulting in little or no time available to allow operator action to mitigate the event.

## BASES

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### ACTIONS

The Actions are modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable to the RCS pressure relief capabilities (PORVs and RHR suction relief valves or vent of  $\geq 2.0$  square inches with the RCS depressurized). As a result, MODE changes are allowed when one or more of these capabilities are inoperable. This allowance is provided because the Required Actions have been determined to provide an acceptable level of safety.

#### A.1 and B.1

With two centrifugal charging pumps capable of injecting into the RCS, or one positive displacement charging pump capable of injecting into the RCS, or any SI pump capable of injecting into the RCS, RCS overpressurization is possible. The requirement to immediately initiate action (except during charging pump swap operation) to restore restricted coolant input capability to the RCS reflects the urgency of removing the RCS from this condition.

Required Action A.1 is modified by a Note that permits two charging pumps capable of RCS injection for  $\leq 15$  minutes to allow for pump swaps.

#### C.1 and D.1

An unisolated accumulator requires isolation within 1 hour. This is only required when the accumulator pressure is at or more than the maximum RCS pressure for the existing temperature allowed by the P/T limit curves.

If the Required Action and associated Completion Time of Condition C are not met, Required Action D.1 must be performed in the next 12 hours. Depressurizing the accumulators below the LTOP limit from the PTLR prevents an accumulator pressure from exceeding the LTOP limits if the accumulators are fully injected.

The Completion Times are based on operating experience that these activities can be accomplished in these time periods and on engineering evaluations indicating that an event requiring LTOP is not likely in the allowed times.

BASES

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ACTIONS (continued)

E.1

In MODE 4, with one required RCS relief valve inoperable, the RCS relief valve must be restored to OPERABLE status within a Completion Time of 7 days. Two RCS relief valves in any combination of the PORVS and the RHR suction relief valves are required to provide low temperature overpressure mitigation while withstanding a single failure of an active component.

The Completion Time considers that only one of the RCS relief valves is required to mitigate an overpressure transient and that the likelihood of an active failure of the remaining valve path during this time period is very low.

F.1

The consequences of operational events that will overpressurize the RCS are more severe at lower temperature (Ref. 5). Thus, with one of the two RCS relief valves inoperable in MODE 5 or in MODE 6 with the head on, the Completion Time to restore two valves to OPERABLE status is 24 hours.

The Completion Time represents a reasonable time to investigate and repair several types of relief valve failures without exposure to a lengthy period with only one OPERABLE RCS relief valve to protect against overpressure events.

BASES

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ACTIONS (continued)

G.1

The RCS must be depressurized and a vent must be established within 8 hours when:

- a. Both required RCS relief valves are inoperable; or
- b. The Required Action and associated Completion Time of Condition D, E, or F is not met; or
- c. The LTOP System is inoperable for any reason other than Condition A, B, C, D, E, or F.

The vent must be sized  $\geq 2.0$  square inches to ensure that the flow capacity is greater than that required for the worst case mass input transient reasonable during the applicable MODES. This action is needed to protect the RCPB from a low temperature overpressure event and a possible brittle failure of the reactor vessel.

The Completion Time considers the time required to place the unit in this Condition and the relatively low probability of an overpressure event during this time period due to increased operator awareness of administrative control requirements.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.12.1, SR 3.4.12.2, and SR 3.4.12.3

To minimize the potential for a low temperature overpressure event by limiting the mass input capability, all SI pumps and all charging pumps but one centrifugal charging pump are verified incapable of injecting into the RCS, and the accumulator discharge isolation valves are verified closed and de-energized.

The SI pumps and charging pumps are rendered incapable of injecting into the RCS through removing the power from the pumps by racking the breakers out under administrative control. An alternate method of LTOP control may be employed using at least two independent means to prevent a mass addition event such that a single failure or single action will not result in an injection into the RCS. This may be accomplished through the pump control switch being placed in pull to lock and at least one valve in the discharge flow path being closed. This latter method is appropriate when the SI pump needs to be available for mitigation of the effects of a loss of decay heat removal event (Ref. 6). Another alternate method of LTOP control may be utilized when a pump must be energized for testing or for filling accumulators to assure positive control of the capability for injection by the pump. This may be accomplished by closing the isolation valve and removing power from the valve operator, or by securing a manual isolation valve in the closed position. These methods are acceptable provided that an OPERABLE flow path exists from the RWST to the RCS.

The Frequency of 12 hours is sufficient, considering other indications and alarms available to the operator in the control room, to verify the required status of the equipment.

SR 3.4.12.3 is modified by a Note stating that accumulator isolation is only required to be met for an accumulator if its pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in the PTLR.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.12.4

The RCS vent of  $\geq 2.0$  square inches is proven OPERABLE by verifying its open condition either:

- a. Once every 12 hours for a valve that cannot be locked.
- b. Once every 31 days for a valve that is locked, sealed, or secured in position. A removed pressurizer safety valve fits this category.

The passive vent arrangement must only be open to be OPERABLE. This Surveillance is required to be performed if the vent is being used to satisfy the pressure relief requirements of LCO 3.4.12.d.4.

SR 3.4.12.5

Each required RHR suction relief valve shall be demonstrated OPERABLE by verifying its RHR suction isolation valves are open. This Surveillance is only required to be performed if the RHR suction relief valve is being used to satisfy this LCO.

The RHR suction isolation valves, RH8701A and RH8701B for relief valve RH8708A, and RH8702A and RH8702B for relief valve RH8708B, are verified to be opened every 72 hours. The Frequency is considered adequate in view of other administrative controls such as valve status indications available to the operator in the control room that verify the RHR suction valves remain open.

The ASME Code, Section XI (Ref. 7), test per Inservice Testing Program verifies OPERABILITY by proving proper relief valve mechanical motion and by measuring and, if required, adjusting the lift setpoint.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.12.6

The PORV block valve must be verified open every 72 hours to provide the flow path for each required PORV to perform its function when actuated. The valve must be remotely verified open in the main control room.

The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required removed, and the manual operator is not required locked in the inactive position. Thus, the block valve can be closed in the event the PORV develops excessive leakage or does not close (sticks open) after relieving an overpressure situation.

The 72 hour Frequency is considered adequate in view of other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open.

SR 3.4.12.7

Performance of a COT is required within 12 hours after decreasing RCS temperature to  $\leq 350^{\circ}\text{F}$  and every 31 days on each required PORV to verify and, as necessary, adjust its lift setpoint. The COT will verify the setpoint is within the allowed maximum limits in the PTLR. PORV actuation could depressurize the RCS and is not required.

The 12 hour Frequency considers the unlikelihood of a low temperature overpressure event during this time.

A Note indicates that this SR is not required to be performed until 12 hours after decreasing RCS cold leg temperature to  $\leq 350^{\circ}\text{F}$ . The COT cannot be performed until in the LTOP MODES when the PORV lift setpoint can be reduced to the LTOP setting. The test must be performed within 12 hours after entering the LTOP MODES.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.12.8

Performance of a CHANNEL CALIBRATION on each required PORV actuation channel is required every 18 months to adjust the whole channel so that it responds and the valve opens within the required range and accuracy to known input.

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REFERENCES

1. 10 CFR 50, Appendix G.
2. Generic Letter 88-11.
3. ASME, Boiler and Pressure Vessel Code, Section III.
4. UFSAR, Chapter 15.
5. Generic Letter 90-06.
6. Safety Evaluation Report, dated August 31, 1990.
7. ASME, Boiler and Pressure Vessel Code, Section XI.

BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.13 RCS Operational LEAKAGE

#### BASES

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#### BACKGROUND

Components that contain or transport the coolant to or from the reactor core make up the RCS. Component joints are made by welding, bolting, rolling, or pressure loading. Valves isolate connecting systems from the RCS.

During plant life, the joint and valve interfaces can produce varying amounts of reactor coolant LEAKAGE, through either normal operational wear or mechanical deterioration. The purpose of the RCS Operational LEAKAGE LCO is to limit system operation in the presence of LEAKAGE from these sources to amounts that do not compromise safety. This LCO specifies the types and amounts of LEAKAGE.

10 CFR 50, Appendix A, GDC 30 (Ref. 1), requires means for detecting and, to the extent practical, identifying the source of reactor coolant LEAKAGE. Regulatory Guide 1.45 (Ref. 2) describes acceptable methods for selecting leakage detection systems. The leakage detection instrumentation is discussed in Section 3.4.15.

The safety significance of RCS LEAKAGE varies widely depending on its source, rate, and duration. Therefore, detecting and monitoring reactor coolant LEAKAGE into the containment area is necessary. Quickly separating the identified LEAKAGE from the unidentified LEAKAGE is necessary to provide quantitative information to the operators, allowing them to take corrective action should a leak occur that is detrimental to the safety of the facility and the public.

A limited amount of leakage inside containment is expected from systems that cannot be made 100% leaktight. Leakage from these systems should be detected, located (identified), and isolated in such a manner, if possible, to not interfere with detection of unidentified RCS leakage.

BASES

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BACKGROUND (continued)

This LCO deals with protection of the Reactor Coolant Pressure Boundary (RCPB) from degradation and the core from inadequate cooling, in addition to preventing the accident analyses radiation release assumptions from being exceeded. The consequences of violating this LCO include the possibility of a Loss Of Coolant Accident (LOCA). However, the ability to monitor leakage provides advance warning to permit unit shutdown before a LOCA occurs. This advantage has been shown by "leak before break" studies.

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APPLICABLE  
SAFETY ANALYSIS

Except for primary to secondary LEAKAGE, the safety analyses do not address operational LEAKAGE. However, other operational LEAKAGE is related to the safety analyses for LOCA; the amount of leakage can affect the probability of such an event. The safety analysis for an event resulting in steam discharge to the atmosphere assumes 1 gpm primary to secondary LEAKAGE as the initial condition.

Primary to secondary LEAKAGE is a factor in the dose releases outside containment resulting from a Steam Line Break (SLB) accident because such leakage contaminates the secondary fluid. Other accidents or transients involve secondary steam release to the atmosphere, such as a Steam Generator Tube Rupture (SGTR). The SGTR is more limiting than the SLB for site radiation releases.

The UFSAR (Ref. 3) analysis for SGTR assumes the contaminated secondary fluid is released for a limited time via the steam generator PORV. After a tube rupture occurs, reactor coolant immediately begins flowing from the primary system into the secondary side of the ruptured steam generator causing the RCS pressure to decrease until a reactor trip occurs on low pressurizer pressure. The analysis assumes a Loss of Offsite Power occurs coincident with the reactor trip causing the Reactor Coolant Pumps to trip and the main condenser to become unavailable when the circulating water pumps are lost.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

After the reactor trips, the core power quickly decreases to decay heat levels. The steam dump system cannot be used to dissipate the core decay heat due to the unavailable condenser. Therefore, the secondary pressure increases in the Steam Generators (SGs) until the steam generator PORVs open at which time the ruptured steam generator PORV is assumed to fail in the open position. The ruptured SG failed PORV is isolated when the block valve is manually closed twenty minutes after the PORV first opened. The 1 gpm primary to secondary LEAKAGE is relatively inconsequential to the results of this analysis.

The dose consequences resulting from the SLB accident are well within the limits defined in 10 CFR 100.

To support the use of sleeving techniques for steam generator tube repair, the Unit 1 primary to secondary leakage limits are conservatively reduced from 500 gpd for any single steam generator and 1 gpm total to 150 gpd for any single steam generator and 600 gpd total (Ref. 4).

The RCS operational LEAKAGE satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

RCS operational LEAKAGE shall be limited to:

a. Pressure Boundary LEAKAGE

No pressure boundary LEAKAGE is allowed, being indicative of material deterioration. LEAKAGE of this type is unacceptable as the leak itself could cause further deterioration, resulting in higher LEAKAGE. Violation of this LCO could result in continued degradation of the RCPB. LEAKAGE past seals, valve seats, and gaskets is not pressure boundary LEAKAGE.

BASES

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LCO (continued)

b. Unidentified LEAKAGE

One gallon per minute (gpm) of unidentified LEAKAGE is allowed as a reasonable minimum detectable amount that the containment air monitoring and containment sump discharge flow monitoring equipment can detect within a reasonable time period. Violation of this LCO could result in continued degradation of the RCPB, if the LEAKAGE is from the pressure boundary.

c. Identified LEAKAGE

Up to 10 gpm of identified LEAKAGE is considered allowable because LEAKAGE is from known sources that do not interfere with detection of unidentified LEAKAGE and is well within the capability of the RCS Makeup System. Identified LEAKAGE includes LEAKAGE to the containment from specifically known and located sources, but does not include pressure boundary LEAKAGE or controlled Reactor Coolant Pump (RCP) seal leakoff (a normal function not considered LEAKAGE). Violation of this LCO could result in continued degradation of a component or system.

d. Primary to Secondary LEAKAGE through All Steam Generators (SGs)

Total primary to secondary LEAKAGE amounting to 600 gallons per day through all SGs not isolated from the RCS produces acceptable offsite doses in the SLB accident analysis. Violation of this LCO could exceed the offsite dose limits for this accident. Primary to secondary LEAKAGE must be included in the total allowable limit for identified LEAKAGE.

BASES

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LCO (continued)

e. Primary to Secondary LEAKAGE through Any One SG

The 150 gallons per day limit on one SG is based on the assumption that a single crack leaking this amount would not propagate to a SGTR under the stress conditions of a LOCA or a main steam line rupture. If leaked through many cracks, then the cracks are very small, and the above assumption is conservative.

LCO 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage," measures leakage through each individual Pressure Isolation Valve (PIV) and can impact this LCO. Of the two PIVs in series in each isolated line, leakage measured through one PIV does not result in RCS LEAKAGE when the other is leak tight. If both valves leak and result in a loss of mass from the RCS, the loss must be included as identified LEAKAGE.

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APPLICABILITY

In MODES 1, 2, 3, and 4, the potential for RCPB LEAKAGE is greater due to RCS pressure.

In MODES 5 and 6, LEAKAGE limits are not required because the reactor coolant pressure is far lower, resulting in lower stresses and reduced potentials for LEAKAGE.

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ACTIONS

A.1

Unidentified LEAKAGE, identified LEAKAGE, or primary to secondary LEAKAGE in excess of the LCO limits must be reduced to within limits within 4 hours. This Completion Time allows time to verify leakage rates and either identify unidentified LEAKAGE or reduce LEAKAGE to within limits before the reactor must be shut down. This Required Action is necessary to prevent further deterioration of the RCPB.

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BASES

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ACTIONS (continued)

B.1 and B.2

If any pressure boundary LEAKAGE exists, or if unidentified LEAKAGE, identified LEAKAGE, or primary to secondary LEAKAGE cannot be reduced to within limits within 4 hours, the reactor must be brought to lower pressure conditions to reduce the severity of the LEAKAGE and its potential consequences. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. The unit must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This action reduces the LEAKAGE and also reduces the factors that tend to degrade the pressure boundary.

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 plant systems. In MODE 5, the pressure stresses acting on the RCPB are much lower, and further deterioration is much less likely.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.13.1

Verifying RCS LEAKAGE to be within the LCO limits ensures the integrity of the RCPB is maintained. Pressure boundary LEAKAGE would at first appear as unidentified LEAKAGE and can only be positively identified by inspection. It should be noted that LEAKAGE past seals, valve seats, and gaskets is not pressure boundary LEAKAGE. Unidentified LEAKAGE and identified LEAKAGE are determined by performance of an RCS water inventory balance. Primary to secondary leakage is a component of the gross leakage as determined by the performance of an RCS inventory balance. Primary to secondary leakage is quantified by analysis of the radionuclides present in secondary feedwater, steam, or condensate, or the noncondensable gaseous effluent.

The RCS water inventory balance must be performed with the reactor at steady state operating conditions and near operating pressure. Therefore, a Note is added allowing that this SR is not required to be performed until 12 hours after establishing steady state operation. The 12 hour allowance provides sufficient time to collect and process all necessary data after stable plant conditions are established.

Steady state operation is required to perform a proper inventory balance since calculations during maneuvering are not useful. For RCS operational LEAKAGE determination by water inventory balance, steady state is defined as stable RCS pressure ( $\geq 2150$  psig), temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows.

An early warning of pressure boundary LEAKAGE or unidentified LEAKAGE is provided by the systems that monitor the containment atmosphere radioactivity and the containment sump level. It should be noted that LEAKAGE past seals and gaskets is not pressure boundary LEAKAGE. These leakage detection systems are specified in LCO 3.4.15, "RCS Leakage Detection Instrumentation."

The 72 hour Frequency during steady state operation is a reasonable interval to trend LEAKAGE and recognizes the importance of early leakage detection in the prevention of accidents.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.13.2

This SR provides the means necessary to determine SG OPERABILITY. The requirement to demonstrate SG tube integrity in accordance with the Steam Generator Tube Surveillance Program emphasizes the importance of SG tube integrity, even though this Surveillance cannot be performed at normal operating conditions.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 30.
2. Regulatory Guide 1.45, May 1973.
3. UFSAR, Chapter 15.
4. Safety Evaluation Report, dated May 7, 1994.

## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.14 RCS Pressure Isolation Valve (PIV) Leakage

#### BASES

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#### BACKGROUND

10 CFR 50.2, 10 CFR 50.55a(c), and GDC 55 of 10 CFR 50, Appendix A (Refs. 1, 2, and 3), define RCS PIVs as any two normally closed valves in series within the Reactor Coolant Pressure Boundary (RCPB), which separate the high pressure RCS from an attached low pressure system. During their lives, these valves can produce varying amounts of reactor coolant leakage through either normal operational wear or mechanical deterioration. The RCS PIV Leakage LCO allows RCS high pressure operation when leakage through these valves exists in amounts that do not compromise safety.

The PIV leakage limit applies to each individual valve. Leakage through both series PIVs in a line must be included as part of the identified LEAKAGE, governed by LCO 3.4.13, "RCS Operational LEAKAGE." This is true during operation only when the loss of RCS mass through two series valves is determined by a water inventory balance (SR 3.4.13.1). A known component of the identified LEAKAGE before operation begins is the least of the two individual leak rates determined for leaking series PIVs during the required surveillance testing; leakage measured through one PIV in a line is not RCS operational LEAKAGE if the other is leaktight.

Although this specification provides a limit on allowable PIV leakage rate, its main purpose is to prevent overpressure failure of the low pressure portions of connecting systems. The leakage limit is an indication that the PIVs between the RCS and the connecting systems are degraded or degrading. PIV leakage could lead to overpressurization of the low pressure piping or components. Failure consequences could be a Loss Of Coolant Accident (LOCA) outside of containment, an unanalyzed accident, that could degrade the ability for low pressure injection.

BASES

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BACKGROUND (continued)

The basis for this LCO is the 1975 NRC "Reactor Safety Study" (Ref. 4) that identified potential intersystem LOCAs as a significant contributor to the risk of core melt. A subsequent study (Ref. 5) evaluated various PIV configurations to determine the probability of intersystem LOCAs. PIVs are provided to isolate the RCS from the following connected systems:

- a. Residual Heat Removal (RHR) System;
- b. Safety Injection (SI) System; and
- c. Chemical and Volume Control System.

Violation of this LCO could result in continued degradation of a PIV, which could lead to overpressurization of a low pressure system and the loss of the integrity of a fission product barrier.

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APPLICABLE  
SAFETY ANALYSES

Reference 4 identified potential intersystem LOCAs as a significant contributor to the risk of core melt. The dominant accident sequence in the intersystem LOCA category is the failure of the low pressure portion of the RHR System outside of containment. The accident is the result of a postulated failure of the PIVs, which are part of the RCPB, and the subsequent pressurization of the RHR System downstream of the PIVs from the RCS. Because the low pressure portion of the RHR System is designed for 600 psig, overpressurization failure of the RHR low pressure line could result in a LOCA outside containment and subsequent risk of core melt.

Reference 5 evaluated various PIV configurations, leakage testing of the valves, and operational changes to determine the effect on the probability of intersystem LOCAs. This study concluded that periodic leakage testing of the PIVs can substantially reduce the probability of an intersystem LOCA.

RCS PIV leakage satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO

RCS PIV OPERABILITY protects the low pressure systems attached to the RCS from potential failure due to overpressurization. This protection (i.e., RCS PIV OPERABILITY) is provided by both the leak tight PIVs and the RHR System suction isolation valve interlocks.

RCS PIV leakage is identified LEAKAGE into closed systems connected to the RCS. Isolation valve leakage is usually on the order of drops per minute. Leakage that increases significantly suggests that something is operationally wrong and corrective action must be taken.

The LCO PIV leakage limit is 0.5 gpm per nominal inch of valve size with a maximum limit of 5 gpm. The previous criterion of 1 gpm for all valve sizes imposed an unjustified penalty on the larger valves without providing information on potential valve degradation and resulted in higher personnel radiation exposures. A study concluded a leakage rate limit based on valve size was superior to a single allowable value (Ref. 6).

Reference 7 permits leakage testing at a lower pressure differential than between the specified maximum RCS pressure and the normal pressure of the connected system during RCS operation (the maximum pressure differential) in those types of valves in which the higher service pressure will tend to diminish the overall leakage channel opening. In such cases, the observed rate may be adjusted to the maximum pressure differential by assuming leakage is directly proportional to the pressure differential to the one half power.

BASES

LCO (continued)

The following valves are RCS PIVs:

<u>Valve Number</u>	<u>Function</u>
SI8900A, B, C, D SI8815	Charging/SI check valve Charging/SI backup check valve
SI8948A, B, C, D SI8956A, B, C, D	Accumulator check valve Accumulator backup check valve
SI8818A, B, C, D SI8819A, B, C, D SI8949A, B, C, D SI8905A, B, C, D	RHR cold leg check valve SI cold leg check valve SI hot leg check valve SI hot leg backup check valve
SI8841A, B RH8701A, B	RHR hot leg check valve RHR suction Motor Operated Valve (MOV)
RH8702A, B	RHR suction MOV

APPLICABILITY In MODES 1, 2, 3, and 4, this LCO applies because the PIV leakage potential is greatest when the RCS is pressurized.

In MODES 5 and 6, leakage limits are not provided because the lower reactor coolant pressure results in a reduced potential for leakage and for a LOCA outside the containment.

ACTIONS The Actions are modified by two Notes. Note 1 provides clarification that separate entry into a Condition is allowed for each flow path. This is allowed based upon the functional independence of the flow path. Note 2 requires an evaluation of affected systems if a PIV is inoperable. The leakage may have affected system operability, or isolation of a leaking flow path with an alternate valve may have degraded the ability of the interconnected system to perform its safety function.

BASES

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ACTIONS (continued)

A.1 and A.2

The flow path must be isolated by two valves. Required Actions A.1 and A.2 are modified by a Note that the valve used for isolation must meet the same leakage requirements as the PIVs and must be within the RCPB or the high pressure portion of the system.

Required Action A.1 requires that the isolation with one valve must be performed within 4 hours. Four hours provides time to reduce leakage in excess of the allowable limit and to isolate the affected system if leakage cannot be reduced. The 4 hour Completion Time allows the actions and restricts the operation with leaking isolation valves.

Required Action A.2 specifies that the double isolation barrier of two valves be restored by closing some other valve qualified for isolation or restoring one leaking PIV. The 72 hour Completion Time after exceeding the limit considers the time required to complete this Action and the low probability of a second valve failing during this period.

B.1

The inoperability of the RHR System suction isolation valve interlock could allow inadvertent opening of the valves at RCS pressures in excess of the RHR Systems design pressure. If the RHR System suction isolation valve interlock is inoperable, operation may continue as long as the affected RHR suction penetration is closed by at least one de-energized power operated valve within 4 hours. This Action accomplishes the purpose of the interlock function.



BASES

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ACTIONS (continued)

C.1 and C.2

If the Required Actions and associated Completion Times of Conditions A and B are not met, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 5 within 36 hours. This Action may reduce the leakage and also reduces the potential for a LOCA outside the containment. 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.14.1

Performance of leakage testing on each RCS PIV or isolation valve used to satisfy Required Action A.1 and Required Action A.2 is required to verify that leakage is below the specified limit and to identify each leaking valve. The leakage limit of 0.5 gpm per inch of nominal valve diameter up to 5 gpm maximum applies to each valve. Leakage testing requires a stable pressure condition.

For two PIVs in series, the leakage requirement applies to each valve individually and not to the combined leakage across both valves. If the PIVs are not individually leakage tested, one valve may have failed completely and not be detected if the other valve in series meets the leakage requirement. In this situation, the protection provided by redundant valves would be lost.

Testing is to be performed every 18 months, a typical refueling cycle, if the plant does not go into MODE 5 for at least 7 days. The 18 month Frequency is consistent with 10 CFR 50.55a(g) (Ref. 8) as contained in the Inservice Testing Program, is within the frequency allowed by the American Society of Mechanical Engineers (ASME) Code, Section XI (Ref. 7).

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Testing must also be performed prior to entering MODE 2 whenever the unit has been in MODE 5 for  $\geq 7$  days if leakage testing has not been performed once within the previous 9 months.

The leakage testing is typically performed at the RCS pressure associated with MODES 1 and 2. This permits leakage testing at high differential pressures with stable conditions. However, test pressures less than 2235 psig but greater than 350 psig are allowed. When measured at these reduced pressures, observed leakage must be adjusted for the actual test pressure up to 2235 psig assuming the leakage to be directly proportional to pressure differential to the one half power.

This SR is modified by three Notes. Note 1 allows entry into MODES 3 and 4 to establish the necessary differential pressures and stable conditions to allow for performance of this Surveillance. Note 1 is applicable to all Frequencies of this Surveillance.

In addition, testing must be performed once after the valve has been opened by flow or exercised to ensure tight reseating. PIVs disturbed in the performance of this Surveillance should also be tested unless it has been established (per Note 2) that an infinite testing loop cannot practically be avoided. Testing must be performed within 24 hours after the valve has been reseated if in MODE 1 or 2, or prior to entry into MODE 2 if not in MODE 1 or 2 at the end of the 24 hour period. Within 24 hours is a reasonable and practical time limit for performing this test after opening or reseating a valve.

Note 3 exempts the RHR suction isolation valves (RH8701A and B and RH8702A and B) from the specified Frequency of this testing since these MOVs are not subject to the same failure characteristics as a check valve that has actuated due to flow.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.14.2

The interlock setpoint that prevents the RHR System suction isolation valves from being opened is set so the actual RCS pressure must be < 360 psig to open the valves. This setpoint ensures the RHR design pressure will not be exceeded and the RHR relief valves will not lift. The 18 month Frequency is based on the need to perform the Surveillance under conditions that apply during a unit outage. The 18 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment.

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REFERENCES

1. 10 CFR 50.2.
2. 10 CFR 50.55a(c).
3. 10 CFR 50, Appendix A, Section V, GDC 55.
4. WASH-1400 (NUREG-75/014), Appendix V, October 1975.
5. NUREG-0677, May 1980.
6. EG&G Report, EGG-NTAP-6175.
7. ASME, Boiler and Pressure Vessel Code, Section XI.
8. 10 CFR 50.55a(g).

## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.15 RCS Leakage Detection Instrumentation

#### BASES

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#### BACKGROUND

GDC 30 of Appendix A to 10 CFR 50 (Ref. 1) requires means for detecting and, to the extent practical, identifying the location of the source of RCS LEAKAGE. Regulatory Guide 1.45 (Ref. 2) describes acceptable methods for selecting leakage detection systems.

Leakage detection systems must have the capability to detect significant Reactor Coolant Pressure Boundary (RCPB) degradation as soon after occurrence as practical to minimize the potential for propagation to a gross failure. Thus, an early indication or warning signal is necessary to permit proper evaluation of all unidentified LEAKAGE.

Industry practice has shown that water flow changes of 0.5 to 1.0 gpm can be readily detected in contained volumes by monitoring changes in water level, in flow rate, or in the operating frequency of a pump. The containment sump, used to collect unidentified LEAKAGE, is instrumented to alarm for leakages of 1.0 gpm. This sensitivity is acceptable for detecting increases in unidentified LEAKAGE.

The reactor coolant contains radioactivity that, when released to the containment, can be detected by radiation monitoring instrumentation. Instrument sensitivities of  $10^{-9}$   $\mu\text{Ci/cc}$  radioactivity for particulate monitoring and of  $10^{-6}$   $\mu\text{Ci/cc}$  radioactivity for gaseous monitoring are practical for these leakage detection systems. Radioactivity detection systems are included for monitoring both particulate and gaseous activities because of their sensitivities and rapid responses to RCS LEAKAGE.

An increase in humidity of the containment atmosphere would indicate release of water vapor to the containment. Dew point temperature measurements can thus be used to monitor humidity levels of the containment atmosphere as an indicator of potential RCS LEAKAGE.

BASES

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BACKGROUND (continued)

Since the humidity level is influenced by several factors, a quantitative evaluation of an indicated leakage rate by this means may be questionable and should be compared to observed increases in liquid flow into or from the containment sump. Humidity level monitoring is considered most useful as an indirect alarm or indication to alert the operator to a potential problem. Humidity monitors are not required by this LCO.

Air temperature and pressure monitoring methods may also be used to infer unidentified LEAKAGE to the containment. Containment temperature and pressure fluctuate slightly during unit operation, but a rise above the normally indicated range of values may indicate RCS leakage into the containment. The relevance of temperature and pressure measurements are affected by containment free volume and, for temperature, detector location. Alarm signals from these instruments can be valuable in recognizing rapid and sizable leakage to the containment. Temperature and pressure monitors are not required by this LCO.

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APPLICABLE  
SAFETY ANALYSES

The need to evaluate the severity of an alarm or an indication is important to the operators, and the ability to compare and verify with indications from other systems is necessary. The system response times and sensitivities are described in the UFSAR (Ref. 3).

The safety significance of RCS LEAKAGE varies widely depending on its source, rate, and duration. Therefore, detecting and monitoring RCS LEAKAGE into the containment area is necessary. Quickly separating the identified LEAKAGE from the unidentified LEAKAGE provides quantitative information to the operators, allowing them to take corrective action should a leak occur detrimental to the safety of the plant and the public.

RCS leakage detection instrumentation satisfies Criterion 1 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO

One method of protecting against large RCS leakage derives from the ability of instruments to rapidly detect extremely small leaks. This LCO requires instruments of diverse monitoring principles to be OPERABLE to provide a high degree of confidence that extremely small leaks are detected in time to allow actions to place the unit in a safe condition, when RCS LEAKAGE indicates possible RCPB degradation.

The LCO is satisfied when monitors of diverse measurement means are available. Thus, the containment sump monitor, in combination with a gaseous or particulate radioactivity monitor, provides an acceptable minimum. The containment floor drain sump flow monitor (RF008) and the reactor cavity sump flow monitor (RF010) are utilized to fulfill the containment sump monitor requirement.

For the containment atmosphere radioactivity monitor, the PR011A (particulate) or PR011B (gaseous) monitor satisfies the LCO requirement.

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APPLICABILITY

Because of elevated RCS temperature and pressure in MODES 1, 2, 3, and 4, RCS leakage detection instrumentation is required to be OPERABLE.

In MODE 5 or 6, the temperature is to be  $\leq 200^{\circ}\text{F}$  and pressure is maintained low or at atmospheric pressure. Since the temperatures and pressures are far lower than those for MODES 1, 2, 3, and 4, the likelihood of leakage and crack propagation are much smaller. Therefore, the requirements of this LCO are not applicable in MODES 5 and 6.

BASES

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ACTIONS

A.1 and A.2

With the required containment sump monitor inoperable, no other form of sampling can provide the equivalent information; however, the containment atmosphere radioactivity monitor will provide indications of changes in leakage. Together with the atmosphere monitor, the periodic surveillance for RCS water inventory balance, SR 3.4.13.1, must be performed at an increased frequency of 24 hours to provide information that is adequate to detect leakage. A Note is added allowing that SR 3.4.13.1 is not required to be performed until 12 hours after establishing steady state operation (stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows). The 12 hour allowance provides sufficient time to collect and process all necessary data after stable plant conditions are established.

Restoration of the required sump monitor to OPERABLE status within a Completion Time of 30 days is required to regain the function after the monitor's failure. This time is acceptable, considering the Frequency and adequacy of the RCS water inventory balance required by Required Action A.1.

Required Action A.1 and Required Action A.2 are modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when the containment sump monitor is inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

BASES

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ACTIONS (continued)

B.1.1, B.1.2, and B.2

With both gaseous and particulate containment atmosphere radioactivity monitoring instrumentation channels inoperable, alternative action is required. Either grab samples of the containment atmosphere must be taken and analyzed for gaseous and particulate radioactivity or water inventory balances, in accordance with SR 3.4.13.1, must be performed to provide alternate periodic information.

With a sample obtained and analyzed or water inventory balance performed every 24 hours, the reactor may be operated for up to 30 days to allow restoration of the required containment atmosphere radioactivity monitors.

The 24 hour interval provides periodic information that is adequate to detect leakage. A Note is added allowing that SR 3.4.13.1 is not required to be performed until 12 hours after establishing steady state operation (stable RCS pressure, temperature, power level, pressurizer and makeup tank levels, makeup and letdown, and RCP seal injection and return flows). The 12 hour allowance provides sufficient time to collect and process all necessary data after stable plant conditions are established. The 30 day Completion Time recognizes at least one other form of leakage detection is available.

Required Action B.1 and Required Action B.2 are modified by a Note that indicates that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when the gaseous and particulate containment atmosphere radioactivity channel is inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.



BASES

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ACTIONS (continued)

C.1 and C.2

If a Required Action and associated Completion Time of Condition A or B is not met, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

D.1

With all required monitors inoperable, no means of monitoring leakage are available, and immediate actions, in accordance with LCO 3.0.3, are required.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.15.1

SR 3.4.15.1 requires the performance of a CHANNEL CHECK of the required containment atmosphere radioactivity monitor. The check gives reasonable confidence that the channel is operating properly. The Frequency of 12 hours is based on instrument reliability and is reasonable for detecting off normal conditions.

SR 3.4.15.2

SR 3.4.15.2 requires the performance of a COT on the required containment atmosphere radioactivity monitor. The test ensures that the monitor can perform its function in the desired manner. The test consists of exercising the digital computer hardware using data base manipulation and injecting simulated process data to verify OPERABILITY of alarm and trip functions. The test verifies the alarm setpoint and relative accuracy of the instrument string. The Frequency of 92 days considers instrument reliability, and operating experience has shown that it is proper for detecting degradation.

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BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.4.15.3 and SR 3.4.15.4

These SRs require the performance of a CHANNEL CALIBRATION for each of the required RCS leakage detection instrumentation channels. The calibration verifies the accuracy of the instrument string, including the instruments located inside containment. The Frequency of 18 months is a typical refueling cycle and considers channel reliability. Again, operating experience has proven that this Frequency is acceptable.

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REFERENCES

1. 10 CFR 50, Appendix A, Section IV, GDC 30.
2. Regulatory Guide 1.45.
3. UFSAR, Section 5.2.5.

BASES

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## B 3.4 REACTOR COOLANT SYSTEM (RCS)

### B 3.4.16 RCS Specific Activity

#### BASES

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##### BACKGROUND

The maximum dose to the whole body and the thyroid that an individual at the site boundary can receive for 2 hours during an accident is specified in 10 CFR 100 (Ref. 1). The limits on specific activity ensure that the doses are held to a small fraction of the 10 CFR 100 limits during analyzed transients and accidents.

The RCS specific activity LCO limits the allowable concentration level of radionuclides in the reactor coolant. The LCO limits are established to minimize the offsite radioactivity dose consequences in the event of a Steam Generator Tube Rupture (SGTR) accident.

The LCO contains specific activity limits for both DOSE EQUIVALENT I-131 and gross specific activity. The allowable levels are intended to limit the 2 hour dose at the site boundary to a small fraction of the 10 CFR 100 dose guideline limits. The limits in the LCO are standardized, based on parametric evaluations of offsite radioactivity dose consequences for typical site locations.

The parametric evaluations showed the potential offsite dose levels for a SGTR accident were an appropriately small fraction of the 10 CFR 100 dose guideline limits. Each evaluation assumes a broad range of site applicable atmospheric dispersion factors in a parametric evaluation.

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##### APPLICABLE SAFETY ANALYSES

The LCO limits on the specific activity of the reactor coolant ensures that the resulting 2 hour doses at the site boundary will not exceed a small fraction of the 10 CFR 100 dose guideline limits following a SGTR accident. The SGTR safety analysis (Ref. 2) assumes the specific activity of the reactor coolant at the LCO limit and an existing reactor coolant Steam Generator (SG) tube leakage rate of 1 gpm. The safety analysis assumes the specific activity of the secondary coolant at its limit of 0.1  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 from LCO 3.7.3, "Secondary Specific Activity."

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The analysis for the SGTR accident establishes the acceptance limits for RCS specific activity. Reference to this analysis is used to assess changes to the unit that could affect RCS specific activity, as they relate to the acceptance limits.

The analysis is for two cases of reactor coolant specific activity. One case assumes specific activity at 1.0  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 with a concurrent large iodine spike that increases the I-131 iodine release rate from the fuel to the coolant to a value 500 times greater than the release rate corresponding to the initial primary system iodine concentration. The second case assumes the initial reactor coolant iodine activity at 60.0  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 due to a pre-accident iodine spike caused by an RCS transient. In both cases, the noble gas activity in the reactor coolant assumes 1% failed fuel, which closely equals the LCO limit of 100/E  $\mu\text{Ci/gm}$  for gross specific activity.

An SGTR event causes a reduction in reactor coolant inventory. The reduction initiates a reactor trip from a low pressurizer pressure signal or an RCS Overtemperature  $\Delta T$  signal.

If a coincident loss of offsite power occurs, the steam dump valves close to protect the condenser. The rise in pressure in the ruptured SG discharges radioactively contaminated steam to the atmosphere through the SG power operated relief valves and the main steam safety valves. The unaffected SGs remove core decay heat by venting steam to the atmosphere until the cooldown ends.

The safety analysis shows the radiological consequences of an SGTR accident are within a small fraction of the Reference 1 dose guideline limits. Operation with iodine specific activity levels greater than the LCO limit is permissible, if the activity levels do not exceed the limits shown in Figure 3.4.16-1, in the applicable specification, for more than 48 hours. The safety analysis has concurrent and pre-accident iodine spiking levels up to 60.0  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The remainder of the above limit permissible iodine levels shown in Figure 3.4.16-1 are acceptable because of the low probability of a SGTR accident occurring during the established 48 hour time limit. The occurrence of an SGTR accident at these permissible levels could increase the site boundary dose levels, but still be within 10 CFR 100 dose guideline limits.

The limits on RCS specific activity are also used for establishing standardization in radiation shielding and plant personnel radiation protection practices.

RCS specific activity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The specific iodine activity is limited to  $1.0 \mu\text{Ci/gm}$  DOSE EQUIVALENT I-131. The gross specific activity in the reactor coolant is limited to the number of  $\mu\text{Ci/gm}$  equal to 100 divided by  $\bar{E}$  (average disintegration energy of the sum of the average beta and gamma energies of the coolant nuclides). The limit on DOSE EQUIVALENT I-131 ensures the 2 hour thyroid dose to an individual at the site boundary during the Design Basis Accident (DBA) will be a small fraction of the allowed thyroid dose. The limit on gross specific activity ensures the 2 hour whole body dose to an individual at the site boundary during the DBA will be a small fraction of the allowed whole body dose.

The SGTR accident analysis (Ref. 2) shows that the 2 hour site boundary dose levels are within acceptable limits. Violation of the LCO may result in reactor coolant radioactivity levels that could, in the event of an SGTR, lead to site boundary doses that exceed the 10 CFR 100 dose guideline limits.

## BASES

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**APPLICABILITY** In MODES 1 and 2, and in MODE 3 with RCS average temperature  $\geq 500^{\circ}\text{F}$ , operation within the LCO limits for DOSE EQUIVALENT I-131 and gross specific activity are necessary to contain the potential consequences of an SGTR to within the acceptable site boundary dose values.

For operation in MODE 3 with RCS average temperature  $< 500^{\circ}\text{F}$ , and in MODES 4 and 5, the release of radioactivity in the event of a SGTR is unlikely since the saturation pressure of the reactor coolant is below the lift pressure settings of the main steam safety valves.

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## ACTIONS

### A.1 and A.2

With the DOSE EQUIVALENT I-131 specific activity greater than the LCO limit, samples at intervals of 4 hours must be taken to demonstrate that the limits of Figure 3.4.16-1 are not exceeded. The Completion Time of 4 hours provides sufficient time to obtain and analyze a sample. Sampling is done to continue to provide a trend.

The DOSE EQUIVALENT I-131 specific activity must be restored to within limits within 48 hours. The Completion Time of 48 hours is required, if the limit violation resulted from normal iodine spiking.

A Note to the Required Actions excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the ACTIONS even though the ACTIONS may eventually require unit shutdown. This exception is acceptable due to the significant conservatism incorporated into the specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the unit remains at, or proceeds to power operation.

BASES

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ACTIONS (continued)

B.1

If the Required Action and associated Completion Time of Condition A is not met or if the DOSE EQUIVALENT I-131 specific activity is in the unacceptable region of Figure 3.4.16-1, the reactor must be brought to MODE 3 with RCS average temperature < 500°F within 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below 500°F from full power conditions in an orderly manner and without challenging plant systems.

C.1

With the gross specific activity in excess of the allowed limit, the unit must be placed in MODE 3 with RCS average temperature < 500°F. This action lowers the saturation pressure of the reactor coolant below the setpoints of the main steam safety valves and prevents venting the SG to the environment in an SGTR event. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 below 500°F from full power conditions in an orderly manner and without challenging plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.16.1

SR 3.4.16.1 requires performing a gamma isotopic analysis as a measure of the gross specific activity of the reactor coolant at least once every 7 days. A gross radioactivity analysis consists of the quantitative measurement of the total specific activity of the reactor coolant except for radionuclides with half lives < 10 minutes and all radioiodines. The total specific activity is the sum of the degassed beta-gamma activity and the total of all identified gaseous activities in the sample within 2 hours after the sample was taken. Determination of the contributors to the gross specific activity are based upon those energy peaks identifiable with a 95% confidence level. The latest available data may be used for pure beta emitting radionuclides. This Surveillance provides an indication of any increase in gross specific activity.

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BASES

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SURVEILLANCE REQUIREMENTS (continued)

Trending the results of this Surveillance allows proper remedial action to be taken before reaching the LCO limit under normal operating conditions. The Surveillance is applicable in MODES 1 and 2, and in MODE 3 with RCS average temperature  $\geq 500^{\circ}\text{F}$ . The 7 day Frequency considers the unlikelihood of a gross fuel failure during the time.

SR 3.4.16.2

This Surveillance is performed in MODE 1 only to ensure iodine remains within limit during normal operation and following fast power changes when fuel failure is more apt to occur. The 14 day Frequency is adequate to trend changes in the iodine activity level, considering gross activity is monitored every 7 days. The Frequency, between 2 and 6 hours after a power change  $\geq 15\%$  RTP within a 1 hour period, is established because the iodine levels peak during this time following fuel failure; samples at other times would provide inaccurate results.

SR 3.4.16.3

A radiochemical analysis for  $\bar{E}$  determination is required every 184 days (6 months) with the unit operating in MODE 1 equilibrium conditions. The  $\bar{E}$  determination directly relates to the LCO and is required to verify unit operation within the specified gross activity LCO limit. The analysis for  $\bar{E}$  is a measurement of the average energies per disintegration for isotopes with half lives longer than 10 minutes, excluding iodines. The Frequency of 184 days recognizes  $\bar{E}$  does not change rapidly.

This SR has been modified by a Note that indicates sampling is required to be performed within 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for at least 48 hours. This ensures that the radioactive materials are at equilibrium so the analysis for  $\bar{E}$  is representative and not skewed by a crud burst or other similar abnormal event.

BASES

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REFERENCES

1. 10 CFR 100.11, 1973.
2. UFSAR, Section 15.6.3.
3. Safety Evaluation Report, dated May 7, 1994.
4. Safety Evaluation Report, dated August 18, 1994.
5. Safety Evaluation Report, dated November 9, 1995.

BASES

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B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.17 RCS Loop Isolation Valves

BASES

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BACKGROUND

The RCS may be operated with loops isolated in order to perform maintenance. While operating with a loop isolated, there is potential for inadvertently opening the isolation valves in the isolated loop. In this event, the coolant in the isolated loop would suddenly begin to mix with the coolant in the unisolated portion of the RCS. This situation has the potential of causing a positive reactivity addition with a corresponding reduction of SDM if:

- a. The temperature in the isolated loop is lower than the temperature in the unisolated portion of the RCS (cold water incident); or
- b. The boron concentration in the isolated loop is lower than the boron concentration required in the RCS to meet SDM (boron dilution incident).

As discussed in the UFSAR (Ref. 1), the startup of an isolated loop is performed in a controlled manner that virtually eliminates any sudden positive reactivity addition from cold water or boron dilution because:

- a. LCO 3.4.18, "RCS Isolated Loop Startup," and plant operating procedures require that the boron concentration in the isolated loop be maintained higher than the required SDM boron concentration of the unisolated portion of the RCS, thus eliminating the potential for introducing coolant from the isolated loop that could dilute the boron concentration in the unisolated portion of the RCS to less than the required SDM boron concentration;
- b. The cold leg loop isolation valve cannot be opened unless the temperatures of both the hot and cold legs of the isolated loop are within 20°F of the temperatures of the hot and cold legs of the unisolated portion of the RCS (compliance is ensured by operating procedures and automatic interlocks); and

BASES

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BACKGROUND (continued)

- c. Other automatic interlocks, all of which are part of the Reactor Protection System (RPS), prevent opening the hot leg loop isolation valve unless the cold leg loop isolation valve is fully closed.
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APPLICABLE  
SAFETY ANALYSES

During startup of an isolated loop in accordance with LCO 3.4.18, the cold leg loop isolation valve interlocks and operating procedures prevent opening of the valve until the isolated loop and unisolated portion of the RCS boron concentrations and temperatures are within limits. This ensures that any undesirable reactivity effect from the isolated loop does not occur.

The safety analyses assume a minimum SDM as an initial condition for Design Basis Accidents (DBAs) (Ref. 1). Violation of the LCO, combined with mixing of the isolated loop coolant into the unisolated portion of the RCS, could result in the SDM being less than that assumed in the safety analyses.

The above analyses are for DBAs that establish the acceptance limits for the RCS loop isolation valves. Reference to the analyses for these DBAs is used to assess changes to the RCS loop isolation valves as they relate to the acceptance limits.

The boron concentration of an isolated loop may affect SDM and therefore RCS loop isolation valves satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

This LCO ensures that a loop isolation valve that becomes closed in MODES 1 through 4 is fully isolated and the plant placed in MODE 5. Loop isolation valves are used for performing maintenance when the plant is in MODE 5 or 6, and startup of an isolated loop is covered by LCO 3.4.18.

This LCO also ensures that loop isolation valves remain open in MODES 1, 2, 3, and 4. Closure of the loop isolation valves during these MODES results in the potential for an inadvertent startup of an isolated loop which could result in the SDM being less than assumed in the safety analyses.

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APPLICABILITY

In MODES 1 through 4, this LCO is applicable since unisolating an isolated loop has not been analyzed. The potential affects (with a boron concentration or temperature less than that of the unisolated portion of the RCS) may include an inadvertent criticality.

In MODES 5 and 6, the SDM of the operating loops is large enough to permit operation with isolated loops. In these MODES, controlled startup of isolated loops is possible without significant risk of inadvertent criticality.

BASES

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ACTIONS

The Actions have been provided with a Note to clarify that all RCS loop isolation valves for this LCO are treated as separate entities, each with separate Completion Times, (i.e., the Completion Time is on a component basis).

A.1

If power is inadvertently restored to one or more loop isolation valve operators, the potential exists for accidental isolation of a loop with a subsequent inadvertent startup of the isolated loop. The loop isolation valves have motor operators. Therefore, these valves will maintain their last position when power is removed from the valve operator. With power applied to the valve operators, only the interlocks prevent the valve from being operated. Although operating procedures and interlocks make the occurrence of this event unlikely, the prudent action is to remove power from the loop isolation valve operators. The Completion Time of 30 minutes to remove power from the loop isolation valve operators is sufficient considering the complexity of the task.

B.1, B.2, and B.3

Should a loop isolation valve be closed in MODES 1 through 4, the affected loop must be fully isolated immediately and the unit placed in MODE 5 to preclude inadvertent startup of the loop and the potential inadvertent criticality. Required Actions B.2 and B.3 require placing the unit in MODE 3 within 6 hours and 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 plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.4.17.1

The Surveillance is performed at least once per 31 days to ensure that the RCS loop isolation valves are open, with power removed from the loop isolation valve operators. The primary function of this Surveillance is to ensure that power is removed from the valve operators, since SR 3.4.4.1 of LCO 3.4.4, "RCS Loops-MODES 1 and 2," ensures that the loop isolation valves are open by verifying every 12 hours that all loops are operating and circulating reactor coolant. The Frequency of 31 days ensures that the required flow can be made available, is based on engineering judgment, and has proven to be acceptable. Operating experience has shown that the failure rate is so low that the 31 day Frequency is justified.

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REFERENCES

1. UFSAR, Section 15.4.4.



BASES

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B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.18 RCS Loops – Isolated

BASES

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BACKGROUND

The RCS may be operated with loops isolated in MODES 5 and 6 in order to perform maintenance. While operating with a loop isolated, there is potential for inadvertently opening the isolation valves in the isolated loop. In this event, the coolant in the isolated loop would suddenly begin to mix with the coolant in the unisolated portion of the RCS. This situation has the potential of causing a positive reactivity addition with a corresponding reduction of SDM if

- a. The temperature in the isolated loop is lower than the temperature in the unisolated portion of the RCS (cold water incident); or
- b. The boron concentration in the isolated loop is lower than the boron concentration required in the RCS to meet SDM (boron dilution incident).

As discussed in the UFSAR (Ref. 1), the startup of an isolated loop is done in a controlled manner that virtually eliminates any sudden positive reactivity addition from cold water or boron dilution because:

- a. This LCO and plant operating procedures require that the boron concentration in the isolated loop be maintained higher than the required SDM boron concentration of the unisolated portion of the RCS, thus eliminating the potential for introducing coolant from the isolated loop that could dilute the boron concentration in the unisolated portion of the RCS to less than the required SDM boron concentration;
- b. The cold leg loop isolation valve cannot be opened unless the temperatures of both the hot leg and cold leg of the isolated loop are within 20°F of the unisolated portion of the RCS. Compliance with the temperature requirement is ensured by operating procedures and automatic interlocks; and

BASES

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BACKGROUND (continued)

- c. Other automatic interlocks prevent opening the hot leg loop isolation valve unless the cold leg loop isolation valve is fully closed. All of the interlocks are part of the Reactor Protection System.
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APPLICABLE  
SAFETY ANALYSES

During startup of an isolated loop, the cold leg loop isolation valve interlocks and operating procedures prevent opening the valve until the isolated loop and unisolated portion of the RCS boron concentrations and temperatures are within limits. This ensures that any undesirable reactivity effect from the isolated loop does not occur.

The safety analyses assume a minimum SDM as an initial condition for Design Basis Accidents. Violation of this LCO could result in the SDM being reduced in the operating loops to less than that assumed in the safety analyses.

The boron concentration of an isolated loop may affect SDM and therefore RCS isolated loop startup satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

---

LCO

Loop isolation valves are used for performing maintenance when the unit is in MODE 5 or 6. This LCO ensures that the loop isolation valves remain closed until the differentials of temperature and boron concentration between the unisolated portion of the RCS and the isolated loops are within acceptable limits.

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APPLICABILITY

In MODES 5 and 6, the SDM of the unisolated portion of the RCS is large enough to permit operation with isolated loops. In these MODES, controlled startup of isolated loops is possible without significant risk of inadvertent criticality. In MODES 1, 2, 3, and 4, operation with isolated loops is not permitted. See LCO 3.4.17, "RCS Loop Isolation Valves."

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BASES

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ACTIONS

A.1 and B.1

Required Action A.1 and Required Action B.1 assume that the prerequisites of the LCO are not met and a loop isolation valve has been inadvertently opened. Therefore, the Actions require immediate closure of isolation valves to preclude a boron dilution event or a cold water event.

---

SURVEILLANCE  
REQUIREMENTS

SR 3.4.18.1

This Surveillance is performed to ensure that the temperature differential between the isolated loop and the unisolated portion of the RCS is  $\leq 20^{\circ}\text{F}$ . Performing the Surveillance 30 minutes prior to opening the cold leg isolation valve in the isolated loop provides reasonable assurance, based on engineering judgment, that the temperature differential will stay within limits until the cold leg isolation valve is opened. This Frequency has been shown to be acceptable through operating experience.

SR 3.4.18.2

To ensure that the boron concentration of the isolated loop is greater than or equal to the boron concentration required in the RCS to meet SDM, a Surveillance is performed 4 hours prior to opening either the hot or cold leg isolation valve. Performing the Surveillance 4 hours prior to opening either the hot or cold leg isolation valve provides reasonable assurance the resulting boron concentration difference will be within acceptable limits when the loop is unisolated. This Frequency is acceptable due to the amount of time required to sample and confirm concentration results.

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REFERENCES

1. UFSAR, Section 15.4.4.

BASES

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## 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.

BASES

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BACKGROUND (continued)

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. These features ensure that the valves meet the requirements of the Institute of Electrical and Electronic Engineers (IEEE) Standard 279-1971 (Ref. 1) for "operating bypasses" and that the accumulators will be available for injection without reliance on operator action.

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 (Refs. 2 and 3). 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.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

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 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.

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 and centrifugal charging pumps both 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.



BASES

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APPLICABLE SAFETY ANALYSES (continued)

This LCO helps to ensure that the following acceptance criteria established for the ECCS by 10 CFR 50.46 (Ref. 4) will be met following a 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 to the long term cooling requirements of 10 CFR 50.46.

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. For small breaks, the peak clad temperature is not sensitive to the accumulator water volume. For large breaks, there are two competing effects regarding accumulator water volume: the amount of water available for injection versus the injection rate. While a larger water volume is a benefit, it leaves a smaller volume of nitrogen gas in the accumulator which results in a slower injection rate as the accumulator discharges, resulting in a penalty. Conversely, while less water volume is a penalty, it will be injected at a higher rate due to the larger nitrogen gas volume. Since the range of accumulator volumes is relatively small along with the resulting effect on peak cladding temperature, a nominal water volume is used. The analysis conservatively ignores the line water volume from the accumulator to the check valve. The safety analysis assumes a nominal water volume of 7106 gallons based on minimum and maximum volumes of 6995 gallons (31% of indicated level) and 7217 gallons (63% of indicated level), respectively.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The minimum boron concentration setpoint is used in the post LOCA 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 at the minimum nitrogen cover pressure, since sensitivity analyses have demonstrated that higher nitrogen cover pressure results in a computed peak clad temperature benefit. 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 (Refs. 2 and 3).

The accumulators satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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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. 4) could be violated.

BASES

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LCO (continued)

For an accumulator to be considered OPERABLE, the isolation valve must be fully open with power removed, a contained volume  $\geq 31\%$  and  $\leq 63\%$  (6995 gallons to 7217 gallons) with a boron concentration  $\geq 2200$  ppm and  $\leq 2400$  ppm, and a nitrogen cover pressure  $\geq 602$  and  $\leq 647$  psig, must be met.

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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. 4) limit of  $2200^{\circ}\text{F}$ .

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.

BASES

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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 demonstrates that the accumulators do not discharge following a large main steam line break. 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 1 hour. 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 1 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 unit to a LOCA under these conditions.

BASES

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ACTIONS (continued)

C.1 and C.2

If the accumulator cannot be returned to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit 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 unit conditions from full power conditions in an orderly manner and without challenging plant systems.

D.1

If more than one accumulator is inoperable, the unit 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 level and nitrogen cover pressure are verified for each accumulator. 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 Frequency to be appropriate for early detection and correction of off normal trends.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

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.

SR 3.5.1.5

Sampling the affected accumulator within 6 hours after a 1% volume increase (nominally 70 gallons or 10% of indicated level) will identify whether inleakage has caused a reduction in boron concentration to below the required limit. It is not necessary to verify boron concentration of the accumulator after a 1% volume increase (10% indicated level increase) if the added water inventory is from the Refueling Water Storage Tank (RWST) and the boron concentration of the RWST is  $\geq 2200$  ppm and  $\leq 2400$  ppm. With the water contained in the RWST within the boron concentration requirements of the accumulators, any added inventory would not cause the accumulator's boron concentration to exceed the limits of this LCO.

With the only indication available to the operators in the control room being level indication in percent, a required accumulator volume increase of 1% or an increase of 10% of indicated level would require the accumulator to be sampled to verify the accumulator boron concentration is within the limits. The safety analysis assumes a nominal water volume of 7106 gallons based on minimum and maximum volumes of 6995 gallons (31%) and 7217 gallons (63%), respectively. These volumes are also indicated in the specific tank curves for the SI accumulators. The 10% indicated level increase is considered a conservative indication for a 70 gallon increase in the accumulator volume requiring an increase in the sampling requirement to verify accumulator boron concentration remains within the specified limits.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.1.6

Verification every 31 days that power is removed from each accumulator isolation valve operator 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.

The power to the accumulator motor operated isolation valves is removed by opening the motor control center breaker and tagging it out administratively. Since power is removed under administrative control, the 31 day Frequency will provide adequate assurance that power is removed.

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REFERENCES

1. IEEE Standard 279-1971.
2. UFSAR, Chapter 15.
3. UFSAR, Chapter 6.
4. 10 CFR 50.46.

B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS).

B 3.5.2 ECCS – Operating

BASES

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BACKGROUND

The function of the ECCS is to provide core cooling and negative reactivity to ensure that the reactor core is protected after any of the following accidents:

- a. Loss Of Coolant Accident (LOCA), coolant leakage greater than the capability of the normal charging system;
- b. Rod ejection accident;
- c. Loss of secondary coolant accident, including uncontrolled steam release or loss of feedwater; and
- d. Steam Generator Tube Rupture (SGTR).

The addition of negative reactivity is designed primarily for the loss of secondary coolant accident where primary cooldown could add enough positive reactivity to achieve criticality and return to significant power.

There are three phases of ECCS operation: injection, cold leg recirculation, and hot leg recirculation. In the injection phase, water is taken from the Refueling Water Storage Tank (RWST) and injected into the Reactor Coolant System (RCS) through the cold legs. When sufficient water is removed from the RWST to ensure that enough boron has been added to maintain the reactor subcritical and the containment sumps have enough water to supply the required net positive suction head to the ECCS pumps, suction is switched to the containment sump for cold leg recirculation. After approximately 8.5 hours, the ECCS flow is shifted to the hot leg recirculation phase to provide a backflush, which would reduce the boiling in the top of the core and any resulting boron precipitation. Every 24 hours after initiation of hot leg recirculation, the flow path is alternated between hot and cold leg recirculation.



## BASES

## BACKGROUND (continued)

The ECCS consists of three separate subsystems: centrifugal charging (high head), Safety Injection (SI) (intermediate head), and Residual Heat Removal (RHR) (low head). Each subsystem consists of two redundant, 100% capacity trains. The ECCS accumulators and the RWST are also part of the ECCS, but are not considered part of an ECCS flow path as described by this LCO.

The ECCS flow paths consist of piping, valves, heat exchangers, and pumps such that water from the RWST can be injected into the RCS following the accidents described in this LCO. The major components of each subsystem are the centrifugal charging pumps, the RHR pumps, heat exchangers, and the SI pumps. Each of the three subsystems consists of two 100% capacity trains that are interconnected and redundant such that either train is capable of supplying 100% of the flow required to mitigate the accident consequences. This interconnecting and redundant subsystem design provides the operators with the ability to utilize components from opposite trains to achieve the required 100% flow to the core.

During the injection phase of LOCA recovery, a single suction header supplies water from the RWST to the ECCS pumps. Separate piping supplies each subsystem and each train within the subsystem. The discharge from the centrifugal charging pumps combines prior to dividing into four supply lines, each of which feeds the injection line to one RCS cold leg. The discharge from the SI and RHR pumps divides and feeds an injection line to each of the RCS cold legs. Control valves are set to balance the flow to the RCS. This balance ensures sufficient flow to the core to meet the analysis assumptions following a LOCA in one of the RCS cold legs.

For LOCAs that are too small to depressurize the RCS below the shutoff head of the SI pumps, the centrifugal charging pumps supply water until the RCS pressure decreases below the SI pump shutoff head. During this period, the steam generators are used to provide part of the core cooling function.

BASES

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BACKGROUND (continued)

During the recirculation phase of LOCA recovery, RHR pump suction is transferred to the containment sump. The RHR pumps then supply the other ECCS pumps. Initially, recirculation is through the same paths as the injection phase. Subsequently, recirculation alternates injection between the hot and cold legs.

The centrifugal charging subsystem of the ECCS also functions to supply borated water to the reactor core following increased heat removal events, such as a Main Steam Line Break (MSLB). The limiting design conditions occur when the negative moderator temperature coefficient is highly negative, such as at the end of each cycle.

During low temperature conditions in the RCS, limitations are placed on the maximum number of ECCS pumps that may be OPERABLE. Refer to the Bases for LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System," for the basis of these requirements.

The ECCS subsystems are actuated upon receipt of an SI signal. The actuation of safeguard loads is accomplished in a programmed time sequence. If offsite power is available, the safeguard loads start immediately in the programmed sequence. If offsite power is not available, the Engineered Safety Feature (ESF) buses shed normal operating loads and are connected to the emergency Diesel Generators (DGs). Safeguard loads are then actuated in the programmed time sequence. The time delay associated with diesel starting, sequenced loading, and pump starting determines the time required before pumped flow is available to the core following a LOCA.

The active ECCS components, along with the passive accumulators and the RWST covered in LCO 3.5.1, "Accumulators," and LCO 3.5.4, "Refueling Water Storage Tank (RWST)," provide the cooling water necessary to meet GDC 35 (Ref. 1).

BASES

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APPLICABLE  
SAFETY ANALYSES

The LCO helps to ensure that the following acceptance criteria for the ECCS, established by 10 CFR 50.46 (Ref. 2), will be met following a 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;
- d. Core is maintained in a coolable geometry; and
- e. Adequate long term core cooling capability is maintained.

The LCO also limits the potential for a post trip return to power following an MSLB event and ensures that containment temperature limits are met.

Each ECCS subsystem is taken credit for in a large break LOCA event at full power (Ref. 3). This event establishes the requirement for runout flow for the ECCS pumps, as well as the maximum response time for their actuation. The centrifugal charging pumps and SI pumps are credited in a small break LOCA event. This event establishes the flow and discharge head at the design point for the centrifugal charging pumps. The SGTR and MSLB events also credit the centrifugal charging pumps. The OPERABILITY requirements for the ECCS are based on the following LOCA analysis assumptions:

- a. A large break LOCA event, with loss of offsite power and a single failure disabling one RHR pump (both emergency DG trains are assumed to operate due to requirements for modeling full active containment heat removal system operation); and
- b. A small break LOCA event, with a loss of offsite power and a single failure disabling one ECCS train.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

During the blowdown stage of a LOCA, the RCS depressurizes as primary coolant is ejected through the break into the containment. The nuclear reaction is terminated either by moderator voiding during large breaks or control rod insertion for small breaks. Following depressurization, emergency cooling water is injected into the cold legs, flows into the downcomer, fills the lower plenum, and refloods the core.

The effects on containment mass and energy releases are accounted for in appropriate analyses (Refs. 3 and 4). The LCO ensures that an ECCS train will deliver sufficient water to match boiloff rates soon enough to minimize the consequences of the core being uncovered following a large LOCA. It also ensures that the centrifugal charging and SI pumps will deliver sufficient water and boron during a small LOCA to maintain core subcriticality. For smaller LOCAs, the centrifugal charging pump delivers sufficient fluid to maintain RCS inventory. For a small break LOCA, the steam generators continue to serve as the heat sink, providing part of the required core cooling.

The ECCS trains satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

In MODES 1, 2, and 3, two independent (and redundant) ECCS trains are required to ensure that sufficient ECCS flow is available, assuming a single failure affecting either train. Additionally, individual components within the ECCS trains may be called upon to mitigate the consequences of other transients and accidents.

In MODES 1, 2, and 3, an ECCS train consists of a centrifugal charging subsystem, an SI subsystem, and an RHR subsystem. Each train includes the piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST upon an SI signal and automatically transferring suction to the containment sump.

BASES

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LCO (continued)

During an event requiring ECCS actuation, a flow path is required to provide an abundant supply of water from the RWST to the RCS via the ECCS pumps and their respective supply headers to each of the four cold leg injection nozzles. In the long term, this flow path may be switched to take its supply from the containment sump and to supply its flow to the RCS hot and cold legs.

The flow path for each train must maintain its designed independence to ensure that no single failure can disable both ECCS trains.

The LCO is modified by two Notes that allow isolation of both SI pump flow paths and a portion of both RHR flow paths for up to 2 hours to perform pressure isolation valve testing per SR 3.4.14.1 during MODE 3. Isolation of the discharge flow paths of both SI pumps may be accomplished by closing valve SI8835. Isolation of a portion of the discharge flow paths of both RHR pumps may be accomplished by closing either valve SI8809A or SI8809B. With a portion of both RHR flow paths isolated, an alternate means of cold leg injection must be available for each isolated flow path. An alternate means may include: 1) OPERABLE accumulators with their isolation valves either closed, but energized, or open; 2) cold leg injection via the Safety Injection pumps, and the SI8821A/B and the SI8835 valves; or 3) cold leg injection via the Centrifugal Charging pumps and the SI8801A/B valves.

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APPLICABILITY

In MODES 1, 2, and 3, the ECCS OPERABILITY requirements for the limiting Design Basis Accident, a large break LOCA, are based on full power operation. Although reduced power would not require the same level of performance, the accident analysis does not provide for reduced cooling requirements in the lower MODES. The centrifugal charging pump performance is based on a small break LOCA, which establishes the pump performance curve and has less dependence on power. The SI pump performance requirements are based on a small break LOCA. MODE 2 and MODE 3 requirements are bounded by the MODE 1 analysis.

BASES

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APPLICABILITY (continued)

This LCO is only applicable in MODE 3 and above. Below MODE 3, the SI signal setpoint is manually bypassed by operator control, and system functional requirements are relaxed as described in LCO 3.5.3, "ECCS–Shutdown."

In MODES 5 and 6, unit conditions are such that the probability of an event requiring ECCS injection is extremely low. Core cooling requirements in MODE 5 are addressed by LCO 3.4.7, "RCS Loops–MODE 5, Loops Filled," and LCO 3.4.8, "RCS Loops–MODE 5, Loops Not Filled." MODE 6 core cooling requirements are addressed by LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation–High Water Level," and LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation–Low Water Level."

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ACTIONS

A.1 and B.1

With one ECCS train inoperable, 100% of the ECCS flow is provided by the remaining OPERABLE ECCS train. Required Action A.1 requires that the inoperable train be restored to OPERABLE status within 7 days. The 7 day Completion Time is based on a probabilistic risk assessment evaluation (Refs. 6 and 7) which concludes that the Completion Time does not significantly affect the overall probability of core damage.

With two ECCS trains inoperable and at least 100% of the ECCS flow equivalent to a single OPERABLE ECCS train available, Required Action B.1 requires that one train be returned to OPERABLE status within 72 hours. The 72 hour Completion Time is based on an NRC reliability evaluation (Ref. 5) and is a reasonable time for repair of many ECCS components.

An ECCS train is inoperable if it is not capable of delivering design flow to the RCS. Individual components are inoperable if they are not capable of performing their design function or their required supporting systems are not available.

## BASES

## ACTIONS (continued)

The LCO requires the OPERABILITY of a number of independent subsystems. Due to the redundancy of trains and the diversity of subsystems, the inoperability of one component in a train does not render the ECCS incapable of performing its function. Neither does the inoperability of two different components, each in a different train, necessarily result in a loss of function for the ECCS. The intent of these Conditions is to maintain a combination of equipment such that 100% of the ECCS flow equivalent to a single OPERABLE ECCS train remains available. Thus, for 100% of the ECCS flow equivalent to a single OPERABLE ECCS train to remain available, at least one train of each centrifugal charging subsystem, SI subsystem, and RHR subsystem, including an RHR heat exchanger, must be OPERABLE. This allows increased flexibility in unit operations under circumstances when components in opposite trains are inoperable.

Reference 8 describes situations in which one component, such as an RHR crossover valve, can disable both ECCS trains. With one or more component(s) inoperable such that 100% of the flow equivalent to a single OPERABLE ECCS train is not available, the facility is in a condition outside the accident analysis. Therefore, LCO 3.0.3 must be immediately entered.

C.1 and C.2

If the inoperable trains cannot be returned to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to MODE 3 within 6 hours and MODE 4 within 12 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 plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTSSR 3.5.2.1

Verification of proper motor operated valve position ensures that the injection flow path from the ECCS pumps to the RCS is maintained. Misalignment of these valves could render both ECCS trains inoperable. Securing these valves in position by removal of power ensures that they cannot change position as a result of an active failure or be inadvertently misaligned. These valves are of the type, described in Reference 8, that can disable the function of both ECCS trains and invalidate the accident analyses. A 12 hour Frequency is considered reasonable in view of other administrative controls that will ensure a mispositioned valve is unlikely.

SR 3.5.2.2

Verifying the correct alignment for manual, power operated, and automatic valves in the ECCS flow paths provides assurance that the proper flow paths will exist for ECCS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position (e.g., the valves listed in SR 3.5.2.1 and SR 3.5.2.7), since these were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an actuation signal is allowed to be in a nonaccident position provided the valve will automatically reposition within the proper stroke time. This Surveillance does not require any testing or valve manipulation. Rather, it involves verification that those valves capable of being mispositioned are in the correct position. The 31 day Frequency is appropriate because the valves are operated under administrative control, and an improper valve position would only affect a single train. This Frequency has been shown to be acceptable through operating experience.



## BASES

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SURVEILLANCE REQUIREMENTS (continued)SR 3.5.2.3

With the exception of the operating centrifugal charging pump, the ECCS pumps are normally in a standby, nonoperating mode. As such, flow path piping has the potential to develop voids and pockets of entrained gases. The system will perform properly, injecting its full capacity into the RCS upon demand, by maintaining the piping from the ECCS pumps to the RCS full of water. This will also prevent water hammer, pump cavitation, and pumping of noncondensable gas (e.g., air, nitrogen, or hydrogen) into the reactor vessel following an SI signal or during shutdown cooling. This is accomplished by venting the non-operating ECCS pump casings and the discharge piping high points (applicable to idle RH and SI systems only) outside containment to maintain the ECCS piping full of water.

In the event that gas is present at either RH cold leg isolation valve (SI8809A/B) vent valve (SI058A/B), the three gas traps associated with the ECCS crossover piping will be UT inspected to confirm the piping is full of water. SR 3.5.2.3 requires that the RH and SI pump casings and discharge piping high point vent valves be vented. This venting surveillance does not apply to subsystems in communication with operating systems because the flows in these systems are sufficient to provide confidence that water hammer which could occur from voiding would not result in unacceptable dynamic loads. During shutdown cooling operation, the exclusion would apply to the operating RH pump, in addition to the ECCS piping in communication with the operating pump.

For selected portions of piping (i.e., portions involving the idle CV pump discharge piping up to the first check valve on the pump discharge and miniflow lines, the stagnant portion of the piping upstream of the SI8801A/B adjacent to the vent valve SI045, and the piping at the 1CV207 or 2CV206 valve if the B CV pump is idle) the verification that the piping is filled with water will be performed by ultrasonic examination. This examination will provide added assurance that the piping is water solid. These methods are consistent with Reference 9.

## BASES

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SURVEILLANCE REQUIREMENTS (continued)

The 31 day Frequency takes into consideration the gradual nature of gas accumulation in the ECCS piping and the procedural controls governing system operation.

SR 3.5.2.4

Periodic surveillance testing of ECCS pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems is required by SECTION XI of the ASME Code. This type of testing may be accomplished by measuring the pump developed head at only one point of the pump characteristic curve. This verifies both that the measured performance is within an acceptable tolerance of the original pump baseline performance and that the performance at the test flow is greater than or equal to the performance assumed in the plant safety analysis. SRs are specified in the Inservice Testing Program, which encompasses SECTION XI of the ASME Code. SECTION XI of the ASME Code provides the activities and Frequencies necessary to satisfy the requirements.

SR 3.5.2.5 and SR 3.5.2.6

These Surveillances demonstrate that each automatic ECCS valve actuates to the required position on an actual or simulated SI signal (a coincident RWST Level Low-Low signal is required to open the containment sump isolation valves), and that each ECCS pump starts on receipt of an actual or simulated SI signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform these Surveillances under the conditions that apply during a unit outage and the potential for an unplanned unit transient if the Surveillances were performed with the reactor at power. The 18 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment. The actuation logic is tested as part of ESF Actuation System testing, and equipment performance is monitored as part of the Inservice Testing Program.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.7

Realignment of valves in the flow path on an SI signal is necessary for proper ECCS performance. These valves have mechanical stops to allow proper positioning for restricted flow to a ruptured cold leg, ensuring that the other cold legs receive at least the required minimum flow. The 18 month Frequency is based on the same reasons as those stated in SR 3.5.2.5 and SR 3.5.2.6.

SR 3.5.2.8

Periodic inspections of the containment sump suction inlet ensure that it is unrestricted and stays in proper operating condition. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage, on the need to have access to the location, and because of the potential for an unplanned transient if the Surveillance were performed with the reactor at power. This Frequency has been found to be sufficient to detect abnormal degradation and is confirmed by operating experience.

BASES

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 35.
2. 10 CFR 50.46.
3. UFSAR, Section 15.6.5.
4. UFSAR, Section 6.2.1.
5. NRC Memorandum to V. Stello, Jr., from R. L. Baer, "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.
6. Byron Generating Station Limiting Conditions for Operation Relaxation Program, dated April 1984.
7. WCAP-10526, "Limiting Conditions for Operation Relaxation Program."
8. NUREG-1002, "Safety Evaluation Report Related to Operation of Braidwood Station, Units 1 and 2," November 1983.
9. Safety Evaluation Report, dated January 30, 1998 associated with Braidwood Technical Specification Amendment No. 91.

BASES

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B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

B 3.5.3 ECCS – Shutdown

BASES

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BACKGROUND

The Background section for Bases 3.5.2, "ECCS – Operating," is applicable to these Bases, with the following modifications.

In MODE 4, the required ECCS train consists of two separate subsystems: centrifugal charging (high head) and Residual Heat Removal (RHR) (low head).

The ECCS flow paths consist of piping, valves, heat exchangers, and pumps such that water from the Refueling Water Storage Tank (RWST) can be injected into the Reactor Coolant System (RCS) following the accidents described in Bases 3.5.2.

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APPLICABLE  
SAFETY ANALYSES

The Applicable Safety Analyses section of Bases 3.5.2 also applies to this Bases section.

Due to the stable conditions associated with operation in MODE 4 and the reduced probability of occurrence of a Design Basis Accident (DBA), the ECCS operational requirements are reduced. It is understood in these reductions that certain automatic Safety Injection (SI) actuation is not available. In this MODE, sufficient time exists for manual actuation of the required ECCS to mitigate the consequences of a DBA.

Only one train of ECCS is required for MODE 4. This requirement dictates that single failures are not considered during this MODE of operation. The ECCS trains satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

In MODE 4, one of the two independent (and redundant) ECCS trains is required to be OPERABLE to ensure that sufficient ECCS flow is available to the core following a DBA.

In MODE 4, an ECCS train consists of a centrifugal charging subsystem and an RHR subsystem. Each train includes the piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST and transferring suction to the containment sump.

During an event requiring ECCS actuation, a flow path is required to provide an abundant supply of water from the RWST to the RCS via the ECCS pumps and their respective supply headers to each of the four cold leg injection nozzles. In the long term, this flow path may be switched to take its supply from the containment sump and to deliver its flow to the RCS hot and cold legs.

The LCO is modified by a Note that allows an RHR train to be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned (remote or local) to the ECCS mode of operation and not otherwise inoperable. This allows operation in the RHR mode during MODE 4.

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### APPLICABILITY

In MODES 1, 2, and 3, the OPERABILITY requirements for ECCS are covered by LCO 3.5.2.

In MODE 4 with RCS temperature below 350°F, one OPERABLE ECCS train is acceptable without single failure consideration, on the basis of the stable reactivity of the reactor and the limited core cooling requirements.

In MODES 5 and 6, unit conditions are such that the probability of an event requiring ECCS injection is extremely low. Core cooling requirements in MODE 5 are addressed by LCO 3.4.7, "RCS Loops – MODE 5, Loops Filled," and LCO 3.4.8, "RCS Loops – MODE 5, Loops Not Filled." MODE 6 core cooling requirements are addressed by LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation – High Water Level," and LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation – Low Water Level."

BASES

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ACTIONS

A.1

With no ECCS RHR subsystem OPERABLE, the unit is not prepared to respond to a loss of coolant accident or to continue a cooldown using the RHR pumps and heat exchangers. The Completion Time of immediately to initiate actions that would restore at least one ECCS RHR subsystem to OPERABLE status ensures that prompt action is taken to restore the required cooling capacity. Normally, in MODE 4, reactor decay heat is removed from the RCS by an RHR loop. If no RHR loop is OPERABLE for this function, reactor decay heat must be removed by some alternate method, such as use of the steam generators. The alternate means of heat removal must continue until the inoperable RHR loop components can be restored to operation so that decay heat removal is continuous.

With both RHR pumps and heat exchangers inoperable, it would be unwise to require the unit to go to MODE 5, where the only available heat removal system is the RHR. Therefore, the appropriate action is to initiate measures to restore one ECCS RHR subsystem and to continue the actions until the subsystem is restored to OPERABLE status.

B.1

With no ECCS centrifugal charging subsystem OPERABLE, due to the inoperability of the centrifugal charging pump or flow path from the RWST, the unit is not prepared to provide high pressure response to Design Basis Events requiring SI. The 1 hour Completion Time to restore at least one centrifugal charging subsystem to OPERABLE status ensures that prompt action is taken to provide the required cooling capacity or to initiate actions to place the unit in MODE 5, where an ECCS train is not required.

C.1

When the Required Actions of Condition B cannot be completed within the required Completion Time, a controlled shutdown should be initiated. Twenty-four hours is a reasonable time, based on operating experience, to reach MODE 5 in an orderly manner and without challenging plant systems or operators.



BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.5.3.1

The applicable Surveillance descriptions from Bases 3.5.2 apply.

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REFERENCES

The applicable references from Bases 3.5.2 apply.

## B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

### B 3.5.4 Refueling Water Storage Tank (RWST)

#### BASES

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##### BACKGROUND

The RWST supplies borated water to the Chemical and Volume Control System (CVCS) during abnormal operating conditions, to the refueling pool during refueling, and to the ECCS and the Containment Spray System during accident conditions.

The RWST supplies both trains of the ECCS and the Containment Spray System through separate, redundant supply headers during the injection phase of a Loss Of Coolant Accident (LOCA) recovery. A motor operated isolation valve is provided in each header to isolate the RWST from the ECCS once the system has been transferred to the recirculation mode. The recirculation mode is entered when pump suction is transferred to the containment sump following receipt of the RWST Level-Low Low (LO-2) signal. Use of a single RWST to supply both trains of the ECCS and Containment Spray System is acceptable since the RWST is a passive component, and passive failures are not required to be assumed to occur coincidentally with Design Basis Events.

The switchover from normal operation to the injection phase of ECCS operation requires changing centrifugal charging pump suction from the CVCS Volume Control Tank (VCT) to the RWST through the use of isolation valves. Each set of isolation valves is interlocked so that the VCT isolation valves will begin to close once the RWST isolation valves are fully open. Since the VCT is under pressure, the preferred pump suction will be from the VCT until the tank is isolated. This will result in a delay in obtaining the RWST borated water. The effects of this delay are discussed in the Applicable Safety Analyses section of these Bases.

During normal operation in MODES 1, 2, and 3, the Safety Injection (SI) and Residual Heat Removal (RHR) pumps are aligned to take suction from the RWST.

The ECCS pumps are provided with recirculation lines that ensure each pump can maintain minimum flow requirements when operating at or near shutoff head conditions.

BASES

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BACKGROUND (continued)

When the suction for the ECCS and Containment Spray System pumps is transferred to the containment sump, the RWST flow paths must be isolated to prevent a release of the containment sump contents to the RWST, which could result in a release of contaminants to the atmosphere and the eventual loss of suction head for the ECCS pumps.

This LCO ensures that:

- a. The RWST contains sufficient borated water to support the ECCS during the injection phase;
- b. Sufficient water volume exists in the containment sump to support continued operation of the ECCS and Containment Spray System pumps at the time of transfer to the recirculation mode of cooling;
- c. The reactor remains subcritical following a LOCA; and
- d. The RWST contains a sufficient boron concentration to ensure that negative reactivity is available to limit the subsequent return to power following a Main Steam Line Break (MSLB).

Insufficient water in the RWST could result in insufficient cooling capacity when the transfer to the recirculation mode occurs. Improper boron concentrations could result in a reduction of shutdown margin or excessive boric acid precipitation in the core following the LOCA. In addition, improper boron concentrations could adversely affect the pH of the sump following the LOCA which can adversely impact iodine concentrations for offsite doses, stress corrosion cracking of equipment inside containment, and hydrogen production. Finally, improper boron concentrations could adversely affect the pH of the containment spray which can also adversely impact iodine concentrations for offsite doses (Ref. 1).

## BASES

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### APPLICABLE SAFETY ANALYSES

During accident conditions, the RWST provides a source of borated water to the ECCS and Containment Spray System pumps. As such, it provides containment cooling and depressurization, core cooling, and replacement inventory and is a source of negative reactivity for reactor shutdown (Refs. 2 and 3). The design basis transients and applicable safety analyses concerning each of these systems are discussed in the Applicable Safety Analyses section of B 3.5.2, "ECCS - Operating"; B 3.5.3, "ECCS - Shutdown"; and B 3.6.6, "Containment Spray and Cooling Systems." These analyses are used to assess changes to the RWST in order to evaluate their effects in relation to the acceptance limits in the analyses.

The RWST must also meet volume, boron concentration, and temperature requirements for non-LOCA events. The volume is not an explicit assumption in non-LOCA events since the required volume is a small fraction of the available volume. The deliverable volume limit is set by the LOCA and containment analyses. For the RWST, the deliverable volume is different from the total volume contained since, due to the design of the tank, more water can be contained than can be delivered. The minimum boron concentration is an explicit assumption in the MSLB analysis and ensures that negative reactivity is available to limit the subsequent return to power following an MSLB. The minimum boron concentration limit is also an important assumption in ensuring the reactor remains subcritical following a LOCA. The maximum boron concentration is an explicit assumption in the inadvertent ECCS actuation analysis, although it is typically a nonlimiting event and the results are very insensitive to boron concentrations. The maximum temperature ensures that the amount of cooling provided from the RWST during the heatup phase of a feedline break is consistent with safety analysis assumptions; the minimum is an assumption in both the MSLB and inadvertent ECCS actuation analyses, although the inadvertent ECCS actuation event is typically nonlimiting.

BASES

APPLICABLE SAFETY ANALYSES (continued)

The MSLB analysis has considered a delay associated with the interlock between the VCT and RWST isolation valves, and the results show that the departure from nucleate boiling design basis is met. The delay has been established as 27 seconds, with offsite power available, or 37 seconds without offsite power. This response time includes 2 seconds for electronics delay, a 15 second stroke time for the RWST valves, and a 10 second stroke time for the VCT valves.

For a large break LOCA analysis, the lower boron concentration limit of 2300 ppm and a conservative calculation of the minimum RWST volume between the low level setpoint and the low low level setpoint are used to compute the post LOCA sump boron concentration necessary to assure subcriticality. The large break LOCA is the limiting case since the safety analysis assumes that all control rods are out of the core.

The containment analysis and the calculation of the minimum post-LOCA sump pH also use the minimum water volume limit to determine a minimum available RWST volume for calculating the time until recirculation for safety injection and containment spray. Finally, the minimum sump flooding analysis, which ensures sufficient Net Positive Suction Head in the sump for recirculation, uses the minimum water volume limit to determine a minimum available RWST volume.

The upper limit on boron concentration of 2500 ppm is used to determine the maximum allowable time to switch to hot leg recirculation following a LOCA. The purpose of switching from cold leg to hot leg injection is to avoid boron precipitation in the core following the accident.

## BASES

## APPLICABLE SAFETY ANALYSES (continued)

In the ECCS analysis, the containment spray temperature is assumed to be equal to the RWST lower temperature limit of 35°F. If the lower temperature limit is violated, the containment spray further reduces containment pressure. The reduced containment pressure lowers the quality of steam exiting the break thus decreasing the rate which the steam is vented to the containment atmosphere. The decreased rate of steam vented to the containment atmosphere results in a corresponding decrease in the rate the Reactor Coolant System pressure drops and the rate ECCS fluid is injected in the core thereby causing a rise in peak clad temperature. The upper temperature limit of 100°F is used in the small break LOCA analysis and containment OPERABILITY analysis. Exceeding this temperature will result in a higher peak clad temperature, because there is less heat transfer from the core to the injected water for the small break LOCA and higher containment pressures due to reduced containment spray cooling capacity. For the containment response following an MSLB, the lower limit on boron concentration and the upper limit on RWST water temperature are used to maximize the total energy release to containment.

The limits on RWST level and boron concentration also ensure that the post-LOCA sump pH will be between 8.0 and 11.0. The minimum and maximum pH values are verified for each fuel cycle using conservative maximum and minimum RWST volumes and the maximum and minimum allowed RWST boron concentrations. The LOCA offsite dose analysis assumes a conservatively low sump pH for the re-evolution of iodine from the sump. Ensuring that the minimum sump pH is at least 8.0 protects mechanical components and equipment inside containment from the effects of chloride induced stress corrosion cracking. Ensuring that the maximum sump pH is no greater than 11.0 limits the production of hydrogen due to the corrosion of aluminum and zinc inside containment. Finally, the limits on RWST boron concentration also ensure that the containment spray pH is acceptable. The calculation of the iodine removal effectiveness of the containment spray assumes a conservatively low containment spray pH.

The RWST satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The RWST ensures that an adequate supply of borated water is available to cool and depressurize the containment in the event of a Design Basis Accident (DBA), to cool and cover the core in the event of a LOCA, to maintain the reactor subcritical following a DBA, and to ensure adequate level in the containment sump to support ECCS and Containment Spray System pump operation in the recirculation mode.

To be considered OPERABLE, the RWST must meet the water volume, boron concentration, and temperature limits (including vent path) established in the SRs.

---

### APPLICABILITY

In MODES 1, 2, 3, and 4, RWST OPERABILITY requirements are dictated by ECCS and Containment Spray System OPERABILITY requirements. Since both the ECCS and the Containment Spray System must be OPERABLE in MODES 1, 2, 3, and 4, the RWST must also be OPERABLE to support their operation. In MODES 5 and 6, the ECCS and Containment Spray System are not required to be OPERABLE. Therefore, the RWST is not required to be OPERABLE in MODES 5 and 6 to support the ECCS and Containment Spray System.

---

### ACTIONS

#### A.1

With RWST boron concentration or borated water temperature not within limits, they must be returned to within limits within 8 hours. Under these conditions neither the ECCS nor the Containment Spray System can perform its design function. Therefore, prompt action must be taken to restore the tank to OPERABLE condition. The 8 hour limit to restore the RWST temperature or boron concentration to within limits was developed considering the time required to change either the boron concentration or temperature and the fact that the contents of the tank are still available for injection.

BASES

ACTIONS (continued)

B.1

With the RWST inoperable for reasons other than Condition A (e.g., water volume), it must be restored to OPERABLE status within 1 hour.

In this Condition, neither the ECCS nor the Containment Spray System can perform its design function. Therefore, prompt action must be taken to restore the tank to OPERABLE status or to place the unit in a MODE in which the RWST is not required. The short time limit of 1 hour to restore the RWST to OPERABLE status is based on this condition simultaneously affecting redundant trains.

C.1 and C.2

If the RWST cannot be returned to OPERABLE status within the associated Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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.

SURVEILLANCE  
REQUIREMENTS

SR 3.5.4.1

The RWST borated water temperature should be verified every 24 hours to be within the limits assumed in the accident analyses band. This Frequency is sufficient to identify a temperature change that would approach either limit and has been shown to be acceptable through operating experience.

The SR is modified by a Note that eliminates the requirement to perform this Surveillance when ambient air temperatures are within the operating limits of the RWST. With ambient air temperatures within the band, the RWST temperature should not exceed the limits.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.4.2

Heat traced portions of the RWST vent path should be verified every 24 hours to be within the temperature limit needed to prevent ice blockage and subsequent vacuum formation in the tank during rapid level decreases caused by accident conditions. This Frequency is sufficient to identify a temperature change that would approach the lower limit and has been shown to be acceptable through operating experience.

The SR is modified by a Note that eliminates the requirement to perform this Surveillance when the ambient air temperature is  $\geq 35^{\circ}\text{F}$ . With ambient air temperature above this limit, the RWST vent path will be free of ice blockage.

SR 3.5.4.3

The RWST water volume should be verified every 7 days to be above the required minimum level of 89% (useable volume of > 395,000 gallons) in order to ensure that a sufficient initial supply is available for injection and to support continued ECCS and Containment Spray System pump operation on recirculation. Since the RWST volume is normally stable and protected by a low level alarm, a 7 day Frequency is appropriate and has been shown to be acceptable through operating experience.

SR 3.5.4.4

The boron concentration of the RWST should be verified every 7 days to be within the required limits. This SR ensures that the reactor will remain subcritical following a LOCA and will limit the power level increase and subsequently returns the reactor to subcritical immediately following an MSLB. Further, it assures that the resulting sump pH will be maintained in an acceptable range so that boron precipitation in the core will not occur, sufficient iodine will be removed to limit offsite doses, stress corrosion cracking of equipment will be minimized, and hydrogen production will be minimized. Since the RWST volume is normally stable, a 7 day sampling Frequency to verify boron concentration is appropriate and has been shown to be acceptable through operating experience.

BASES

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REFERENCES

1. WCAP-13964, Revision 2, "Commonwealth Edison Company, Byron/Braidwood Units 1 & 2, Increased Steam Generator Tube Plugging/Reduced Thermal Design Flow/Positive Moderator Temperature Coefficient Analysis Program, Engineering/Licensing Report," September 1994.
2. UFSAR, Chapter 15.
3. UFSAR, Section 6.2.1.

BASES

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B 3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

B 3.5.5 Seal Injection Flow

BASES

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BACKGROUND

The function of the seal injection throttle valves during an accident is similar to the function of the ECCS throttle valves in that each restricts flow from the centrifugal charging pump header to the Reactor Coolant System (RCS).

The restriction on Reactor Coolant Pump (RCP) seal injection flow limits the amount of ECCS flow that would be diverted from the injection path following an accident. This limit is based on safety analysis assumptions that are required because RCP seal injection flow is not isolated during Safety Injection (SI).

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APPLICABLE  
SAFETY ANALYSES

All ECCS subsystems are taken credit for in the large break Loss Of Coolant Accident (LOCA) at full power (Ref. 1). The centrifugal charging pumps are also credited in the small break LOCA analysis. These two LOCA analyses establish the minimum flow for the ECCS pumps. The steam generator tube rupture and main steam line break event analyses also credit the centrifugal charging pumps, but are not limiting in their design. Reference to these analyses is made in assessing changes to the Seal Injection System for evaluation of their effects in relation to the acceptance limits in these analyses.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

This LCO ensures that seal injection flow will be sufficient for RCP seal integrity but limited so that the ECCS trains will be capable of delivering sufficient water to match boiloff rates soon enough to minimize uncovering of the core following a large LOCA. It also ensures that the centrifugal charging pumps will deliver sufficient water for a small LOCA and sufficient boron to maintain the core subcritical. For smaller LOCAs, the charging pumps alone deliver sufficient fluid to overcome the loss and maintain RCS inventory. ITS Figure 3.5.5-1 was developed by using a conservative combination of plant data to establish a minimum flow loss coefficient for the seal injection line. Based on the conservative data, Figure 3.5.5-1 ensures adequate flow to the Reactor Coolant Pump seals while ensuring the safety analysis assumption for ECCS flow are maintained. Seal injection flow satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The intent of the LCO limit on seal injection flow is to make sure that flow through the RCP seal water injection line is low enough to ensure that sufficient centrifugal charging pump injection flow is directed to the RCS via the injection points (Ref. 2).

The LCO is not strictly a flow limit, but rather a flow limit based on a flow line resistance. In order to establish the proper flow line resistance, a pressure and flow must be known. The flow line resistance is established by adjusting the RCP seal injection flow in the acceptable region of Figure 3.5.5-1 at a given pressure differential between the charging header and the RCS. The flow limits established by Figure 3.5.5-1 ensure that the minimum ECCS flow assumed in the safety analyses is maintained.

The limit on seal injection flow must be met to render the ECCS OPERABLE. If this condition is not met, the ECCS flow will not be as assumed in the accident analyses.

BASES

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APPLICABILITY      In MODES 1, 2, and 3, the seal injection flow limit is dictated by ECCS flow requirements, which are specified for MODES 1, 2, 3, and 4. The seal injection flow limit is not applicable for MODE 4 and lower, however, because high seal injection flow is less critical as a result of the lower initial RCS pressure and decay heat removal requirements in these MODES. Therefore, RCP seal injection flow must be limited in MODES 1, 2, and 3 to ensure adequate ECCS performance.

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ACTIONS

A.1

With the seal injection flow exceeding its limit, the amount of charging flow available to the RCS may be reduced. Under this Condition, action must be taken to restore the flow to below its limit. The operator has 4 hours from the time the flow is known to be above the limit to correctly position the manual valves and thus be in compliance with the accident analysis. The Completion Time minimizes the potential exposure of the plant to a LOCA with insufficient injection flow and provides a reasonable time to restore seal injection flow within limits. This time is conservative with respect to the Completion Times of other ECCS LCOs; it is based on operating experience and is sufficient for taking corrective actions by operations personnel.

B.1 and B.2

When the Required Actions cannot be completed within the required Completion Time, a controlled shutdown must be initiated. The Completion Time of 6 hours for reaching MODE 3 from MODE 1 is a reasonable time for a controlled shutdown, based on operating experience and normal cooldown rates, and does not challenge plant safety systems or operators. Continuing the unit shutdown begun in Required Action B.1, an additional 6 hours is a reasonable time, based on operating experience and normal cooldown rates, to reach MODE 4, where this LCO is no longer applicable.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.5.5.1

Verification every 31 days that the manual seal injection throttle valves are adjusted to give a flow within the limit ensures that proper manual seal injection throttle valve position, and hence, proper seal injection flow, is maintained. To verify acceptable seal injection flow, the following is performed: differential pressure between the charging header (PT-120) and the RCS is determined and the seal injection flow is verified to be within the limits of Figure 3.5.5-1. The Frequency of 31 days is based on engineering judgment and is consistent with other ECCS valve Surveillance Frequencies. The Frequency has proven to be acceptable through operating experience.

As noted, the Surveillance is not required to be performed until 4 hours after the RCS pressure has stabilized within a  $\pm 20$  psig range of normal operating pressure. The RCS pressure requirement is specified since this configuration will produce the required pressure conditions necessary to assure that the manual valves are set correctly. The exception is limited to 4 hours to ensure that the Surveillance is timely.

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REFERENCES

1. UFSAR, Chapter 6 and Chapter 15.
2. 10 CFR 50.46.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.1 Containment

#### BASES

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##### BACKGROUND

The containment consists of the concrete containment building, its steel liner, and the penetrations through this structure. The structure is designed to contain radioactive material that may be released from the reactor core following a design basis Loss Of Coolant Accident (LOCA). Additionally, this structure provides shielding from the fission products that may be present in the containment atmosphere following accident conditions.

The containment is a reinforced concrete structure with a cylindrical wall, a flat foundation mat, and a shallow dome roof. The inside surface of the containment is lined with a carbon steel liner to ensure a high degree of leak tightness during operating and accident conditions.

The cylinder wall is prestressed with a post tensioning system in the vertical and horizontal directions, and the dome roof is prestressed utilizing a three way post tensioning system.

The concrete containment building is required for structural integrity of the containment under Design Basis Accident (DBA) conditions. The steel liner and its penetrations establish the leakage limiting boundary of the containment. Maintaining the containment OPERABLE limits the leakage of fission product radioactivity from the containment to the environment. SR 3.6.1.1 leakage rate requirements comply with 10 CFR 50, Appendix J, Option B (Ref. 1), as modified by approved exemptions.



BASES

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BACKGROUND (continued)

The isolation devices for the penetrations in the containment boundary are a part of the containment leak tight barrier. To maintain this leak tight barrier:

- a. All penetrations required to be closed during accident conditions are either:
    1. capable of being closed by an OPERABLE automatic containment isolation system, or
    2. closed by manual valves, blind flanges, or de-activated automatic or remote manual valves secured in their closed positions, except as provided in LCO 3.6.3, "Containment Isolation Valves";
  - b. Each air lock is OPERABLE, except as provided in LCO 3.6.2, "Containment Air Locks";
  - c. The equipment hatch is closed; and
  - d. The sealing mechanism associated with each penetration (e.g., welds, bellows, or O rings) is OPERABLE, except as provided in LCO 3.6.3.
- 

APPLICABLE  
SAFETY ANALYSES

The safety design basis for the containment is that the containment must withstand the pressures and temperatures of the limiting DBA without exceeding the design leakage rate.

BASES

APPLICABLE SAFETY ANALYSES (continued)

The DBAs that result in a challenge to containment OPERABILITY from high pressures and temperatures are a LOCA and a steam line break (Ref. 2). In addition, release of significant fission product radioactivity within containment can occur from a LOCA, secondary system pipe break, or fuel handling accident (Ref. 3). In the DBA analyses, it is assumed that the containment is OPERABLE such that, for the DBAs involving release of fission product radioactivity, release to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.10% of containment air weight per day (Ref. 3). This leakage rate, used to evaluate offsite doses resulting from accidents, is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as  $L_a$ : the maximum allowable containment leakage rate at the calculated peak containment internal pressure ( $P_a$ ) resulting from the limiting design basis LOCA. The allowable leakage rate represented by  $L_a$  forms the basis for the acceptance criteria imposed on all containment leakage rate testing.  $L_a$  is assumed to be 0.10% per day in the safety analysis at  $P_a = 47.8$  psig for Unit 1 and  $P_a = 44.4$  psig for Unit 2 (Ref. 3).

Satisfactory leakage rate test results are a requirement for the establishment of containment OPERABILITY.

The containment satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

Containment OPERABILITY is maintained by limiting leakage to  $\leq 1.0 L_a$ , except prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test. At this time, applicable leakage limits must be met.

Compliance with this LCO will ensure a containment configuration, including the equipment hatch, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis.

## BASES

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### LCO (continued)

Individual leakage rates specified for the containment air lock (LCO 3.6.2) and purge valves with resilient seals (LCO 3.6.3) are not specifically part of the acceptance criteria of 10 CFR 50, Appendix J, Option B. Therefore, leakage rates exceeding these individual limits only result in the containment being inoperable when the leakage results in exceeding the overall acceptance criteria of 1.0  $L_a$ .

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### APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material into containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment is not required to be OPERABLE in MODE 5 to prevent leakage of radioactive material from containment. The requirements for containment during MODE 6 are addressed in LCO 3.9.4, "Containment Penetrations."

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### ACTIONS

#### A.1

In the event containment is inoperable, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining containment during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

#### B.1 and B.2

If containment cannot be restored to OPERABLE status within the required 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 at least MODE 3 within 6 hours and to MODE 5 within 36 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.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. Failure to meet air lock and purge valve leakage limits specified in LCO 3.6.2 and LCO 3.6.3 does not invalidate the acceptability of these overall leakage determinations unless their contribution to overall Type A, B, and C leakage causes that to exceed limits. As left leakage prior to the first startup after performing a required leakage test is required to be  $< 0.6 L_a$  for combined Type B and C leakage and  $< 0.75 L_a$  for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of  $\leq 1.0 L_a$ . At  $\leq 1.0 L_a$ , the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.2

This SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are consistent with the requirements of 10 CFR50.55a(b)(2)(vi) "Effective Edition and Addenda of Subsection IWE and Subsection IWL; SECTION XI" (Ref. 4), and Section 10 CFR50.55a(b)(2)(ix), "Examination of Concrete Containments" (Ref. 5). Predicted tendon lift off forces will be determined consistent with the recommendations of Regulatory Guide 1.35.1, (Ref. 6).

BASES

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- REFERENCES
1. 10 CFR 50, Appendix J, Option B.
  2. UFSAR, Chapter 15.
  3. UFSAR, Section 6.2.
  4. 10 CFR50.55a(b)(2)(vi) "Effective Edition and Addenda of Subsection IWE and Subsection IWL, SECTION XI."
  5. 10 CFR50.55a(b)(2)(ix), "Examination of Concrete Containments."
  6. Regulatory Guide 1.35.1, July 1990.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.2 Containment Air Locks

#### BASES

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#### BACKGROUND

Containment air locks form part of the containment pressure boundary and provide a means for personnel access during all MODES of operation.

Each air lock is nominally a right circular cylinder, 10 ft in diameter, with a door at each end. The doors are interlocked to prevent simultaneous opening. During periods when containment is not required to be OPERABLE, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. Each air lock door has been designed and tested to certify its ability to withstand a pressure in excess of the maximum expected pressure following a Design Basis Accident (DBA) in containment. As such, closure of a single door supports containment OPERABILITY. Each of the doors contains double gasketed seals and local leakage rate testing capability to ensure pressure integrity. To effect a leak tight seal, the air lock design uses pressure seated doors (i.e., an increase in containment internal pressure results in increased sealing force on each door).

The containment air locks form part of the containment pressure boundary. As such, air lock integrity and leak tightness is essential for maintaining the containment leakage rate within limit in the event of a DBA. Not maintaining air lock integrity or leak tightness may result in a leakage rate in excess of that assumed in the plant safety analyses.

## BASES

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### APPLICABLE SAFETY ANALYSES

The DBAs that result in a release of radioactive material within containment are a Loss Of Coolant Accident (LOCA), secondary system pipe break, and a fuel handling accident (Ref. 2). In the analysis of each of these accidents, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.1% of containment air weight per day (Ref. 2). This leakage rate is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as the maximum allowable containment leakage rate at the calculated peak containment internal pressure, at  $P_a = 47.8$  psig for Unit 1 and  $P_a = 44.4$  psig for Unit 2 following a DBA. This allowable leakage rate forms the basis for the acceptance criteria imposed on the SRs associated with the air locks.

The containment air locks satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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### LCO

Each containment air lock forms part of the containment pressure boundary. As part of the containment pressure boundary, the air lock safety function is related to control of the containment leakage rate resulting from a DBA. Thus, each air lock's structural integrity and leak tightness are essential to the successful mitigation of such an event.

Each air lock is required to be OPERABLE. For the air lock to be considered OPERABLE, the air lock interlock mechanism must be OPERABLE, the air lock must be in compliance with the Type B air lock leakage test, and both air lock doors must be OPERABLE. The interlock allows only one air lock door of an air lock to be opened at one time. This provision ensures that a gross breach of containment does not exist when containment is required to be OPERABLE. Closure of a single door in each air lock is sufficient to provide a leak tight barrier following postulated events. Nevertheless, both doors are kept closed when the air lock is not being used for normal entry into or exit from containment.

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## BASES

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**APPLICABILITY** In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, the containment air locks are not required in MODE 5 to prevent leakage of radioactive material from containment. The requirements for the containment air locks during MODE 6 are addressed in LCO 3.9.4, "Containment Penetrations."

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**ACTIONS** The ACTIONS are modified by a Note that allows entry and exit to perform repairs on the affected air lock component. If the outer door is inoperable, then it may be easily accessed for most repairs. If the inner door is inoperable, it is preferred that the air lock be accessed from inside primary containment by entering through the other OPERABLE air lock. However, if this is not practicable, or if repairs on either door must be performed from the barrel side of the door, then it is permissible to enter the air lock through the OPERABLE door, which means there is a short time during which the containment boundary is not intact (during access through the OPERABLE door). The ability to open the OPERABLE door, even if it means the containment boundary is temporarily not intact, is acceptable due to the low probability of an event that could pressurize the containment during the short time in which the OPERABLE door is expected to be open. Opening the OPERABLE door must be done under strict administrative controls, consisting of a dedicated individual (i.e., not involved with any repair or other maintenance effort) assigned to ensure that the door is opened only for the period of time required to gain entry into or exit from the air lock, and that any OPERABLE door is re-locked prior to the departure of the dedicated individual. After each entry and exit, the OPERABLE door must be immediately closed. If ALARA conditions permit, entry and exit should be via an OPERABLE air lock.



BASES

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ACTIONS (continued)

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each air lock. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable air lock. Complying with the Required Actions may allow for continued operation, and a subsequent inoperable air lock is governed by subsequent Condition entry and application of associated Required Actions.

In the event the air lock leakage results in exceeding the overall containment leakage rate, Note 3 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1, "Containment."

A.1, A.2, and A.3

With one air lock door in one or more containment air locks inoperable, the OPERABLE door must be verified closed (Required Action A.1) in each affected containment air lock. This ensures that a leak tight containment barrier is maintained by the use of an OPERABLE air lock door. This action must be completed within 1 hour. This specified time period is consistent with the ACTIONS of LCO 3.6.1, which requires containment be restored to OPERABLE status within 1 hour.

In addition, the affected air lock penetration must be isolated by locking closed the OPERABLE air lock door within the 24 hour Completion Time. The 24 hour Completion Time is reasonable for locking the OPERABLE air lock door, considering the OPERABLE door of the affected air lock is being maintained closed.

BASES

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ACTIONS (continued)

Required Action A.3 verifies that an air lock with an inoperable door has been isolated by the use of a locked and closed OPERABLE air lock door. This ensures that an acceptable containment leakage boundary is maintained. The Completion Time of once per 31 days is based on engineering judgment and is considered adequate in view of the low likelihood of a locked door being mispositioned and other administrative controls. Required Action A.3 is modified by a Note that applies to air lock doors located in high radiation areas and allows these doors to be verified locked closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of the door, once it has been verified to be in the proper position, is small.

The Required Actions have been modified by two Notes. Note 1 ensures that only the Required Actions and associated Completion Times of Condition C are required if both doors in the same air lock are inoperable. With both doors in the same air lock inoperable, an OPERABLE door is not available to be closed. Required Actions C.1 and C.2 are the appropriate remedial actions. The exception of Note 1 does not affect tracking the Completion Time from the initial entry into Condition A; only the requirement to comply with the Required Actions.

BASES

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ACTIONS (continued)

Note 2 allows use of the air lock for entry and exit for 7 days under administrative controls if both air locks have an inoperable door. This 7 day restriction begins when the second air lock is discovered inoperable. Containment entry may be required on a periodic basis to perform Technical Specifications (TS) Surveillances and Required Actions, as well as other activities on equipment inside containment that are required by TS or activities on equipment that support TS-required equipment. This Note is not intended to preclude performing other activities (i.e., non-TS-required activities) if the containment is entered, using the inoperable air lock, to perform an allowed activity listed above. The administrative controls consist of a dedicated individual (i.e., not involved with any repair or other maintenance effort) assigned to ensure that the door is opened only for the period of time required to gain entry into or exit from the air lock, and that any OPERABLE door is re-locked prior to the departure of the dedicated individual. This allowance is acceptable due to the low probability of an event that could pressurize the containment during the short time that the OPERABLE door is expected to be open.

B.1, B.2, and B.3

With an air lock interlock mechanism inoperable in one or more air locks, the Required Actions and associated Completion Times are consistent with those specified in Condition A with the exception that both air lock doors may still be OPERABLE, in which case either door can be used to isolate the air lock penetration.

BASES

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ACTIONS (continued)

The Required Actions have been modified by two Notes. Note 1 ensures that only the Required Actions and associated Completion Times of Condition C are required if both doors in the same air lock are inoperable. With both doors in the same air lock inoperable, an OPERABLE door is not available to be closed. Required Actions C.1 and C.2 are the appropriate remedial actions.

Note 2 allows entry into and exit from containment under the control of a dedicated individual stationed at the air lock to ensure that only one door is opened at a time (i.e., the individual performs the function of the interlock) and one door is re-locked prior to the departure of the dedicated individual.

Required Action B.3 is modified by a Note that applies to air lock doors located in high radiation areas and allows these doors to be verified locked closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Therefore, the probability of misalignment of the doors, once they have been verified to be in the proper position, is small.

BASES

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ACTIONS (continued)

C.1, C.2, and C.3

With one or more air locks inoperable for reasons other than those described in Condition A or B (e.g., both doors in the same air lock are inoperable) Condition C is entered. Note, an air lock with only an inoperable door (Condition A) and interlock (Condition B) does not require entry into Condition C. The Required Actions of Conditions A and B provide the appropriate remedial actions for the degraded condition. Required Action C.1 requires action to be initiated immediately to evaluate previous combined leakage rates using current air lock test results. An evaluation is acceptable, since it is overly conservative to immediately declare the containment inoperable if both doors in an air lock have failed a seal test or if the overall air lock leakage is not within limits. In many instances (e.g., only one seal per door has failed), containment remains OPERABLE, yet only 1 hour (per LCO 3.6.1) would be provided to restore the air lock door to OPERABLE status prior to requiring a unit shutdown. In addition, even with both doors failing the seal test, the overall containment leakage rate can still be within limits.

Required Action C.2 requires that one door in the affected containment air lock must be verified to be closed within the 1 hour Completion Time. This specified time period is consistent with the ACTIONS of LCO 3.6.1, which requires that containment be restored to OPERABLE status within 1 hour.

Additionally, the affected air lock(s) must be restored to OPERABLE status within the 24 hour Completion Time. The specified time period is considered reasonable for restoring an inoperable air lock to OPERABLE status, assuming that at least one door is maintained closed in each affected air lock and the overall containment leakage rate is within the Containment Leakage Rate Testing Program leakage limits.

BASES

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ACTIONS (continued)

D.1 and D.2

If the inoperable containment air lock cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.2.1

Maintaining containment air locks OPERABLE requires compliance with the leakage rate test requirements of the Containment Leakage Rate Testing Program. This SR reflects the leakage rate testing requirements with regard to air lock leakage (Type B leakage tests). The acceptance criteria were established during initial air lock and containment OPERABILITY testing. The periodic testing requirements verify that the air lock leakage does not exceed the allowed fraction of the overall containment leakage rate. The Frequency is required by the Containment Leakage Rate Testing Program.

The SR has been modified by two Notes. Note 1 states that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is considered reasonable since either air lock door is capable of providing a fission product barrier in the event of a DBA. Note 2 has been added to this SR requiring the results to be evaluated against the acceptance criteria which is applicable to SR 3.6.1.1. This ensures that air lock leakage is properly accounted for in determining the combined Type B and C containment leakage rate.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.2.2

The air lock interlock is designed to prevent simultaneous opening of both doors in a single air lock. Since both the inner and outer doors of an air lock are designed to withstand the maximum expected post accident containment pressure, closure of either door will support containment OPERABILITY. Thus, the door interlock feature supports containment OPERABILITY while the air lock is being used for personnel transit in and out of the containment. Periodic testing of this interlock demonstrates that the interlock will function as designed and that simultaneous opening of the inner and outer doors will not inadvertently occur. Due to the purely mechanical nature of this interlock, and given that the interlock mechanism is not normally challenged when the containment air lock door is used for entry and exit (procedures require strict adherence to single door opening), this test is only required to be performed every 24 months. The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage, and the potential for loss of containment OPERABILITY if the Surveillance were performed with the reactor at power. The 24 month Frequency for the interlock is justified based on generic operating experience. The 24 month Frequency is based on engineering judgment and is considered adequate given that the interlock is not challenged during use of the air lock.

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REFERENCES

1. 10 CFR 50, Appendix J, Option B.
2. UFSAR, Section 6.2.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.3 Containment Isolation Valves

#### BASES

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#### BACKGROUND

The containment isolation valves (Table B 3.6.3-1) form part of the containment pressure boundary and provide a means for fluid penetrations not serving accident consequence limiting systems to be provided with two isolation barriers that are closed on a containment isolation signal. These isolation devices are either passive or active (automatic). Manual valves, de-activated automatic or remote manual valves secured in their closed position, check valves with flow through the valve secured, blind flanges, and closed systems are considered passive devices. Check valves, or other automatic valves designed to close without operator action following an accident, are considered active devices. Two barriers in series are provided for each penetration so that no single credible failure or malfunction of an active component can result in a loss of isolation or leakage that exceeds limits assumed in the safety analyses. These barriers (containment isolation valves, blind flanges, and closed systems) make up the Containment Isolation System.

Automatic isolation signals are produced during accident conditions. Containment Phase "A" isolation occurs upon receipt of a safety injection signal. The Phase "A" isolation signal isolates nonessential process lines in order to minimize leakage of fission product radioactivity. Containment Phase "B" isolation occurs upon receipt of a High-3 containment pressure signal and isolates the remaining process lines, except systems required for accident mitigation. The purge valves (supply and exhaust) receive a containment ventilation isolation signal on a containment high radiation condition, safety injection signal, manual Phase A actuation, and manual containment spray actuation. As a result, the containment isolation valves (and blind flanges) help ensure that the containment atmosphere will be isolated from the environment in the event of a release of fission product radioactivity to the containment atmosphere as a result of a Design Basis Accident (DBA).



BASES

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BACKGROUND (continued)

The OPERABILITY requirements for containment isolation valves help ensure that containment is isolated within the time limits assumed in the safety analyses. Therefore, the OPERABILITY requirements provide assurance that the containment function assumed in the safety analyses will be maintained.

Normal Purge System (48 inch purge valves)

The Normal Purge System operates to supply outside air into the containment for ventilation and cooling or heating and may also be used to reduce the concentration of noble gases within containment prior to and during personnel access. The supply and exhaust lines each contain two isolation valves. Because of their large size, the 48 inch purge valves are not qualified for automatic closure from their open position under DBA conditions. Therefore, the 48 inch purge valves are sealed closed in MODES 1, 2, 3, and 4 to ensure the containment boundary is maintained.

Minipurge System (8 inch purge valves)

The Minipurge System operates to:

- a. Reduce the concentration of noble gases within containment prior to and during personnel access; and
- b. Equalize internal and external pressures.

Since the valves used in the Minipurge System are designed to meet the requirements for automatic containment isolation valves, these valves may be opened as needed in MODES 1, 2, 3, and 4.

BASES

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APPLICABLE  
SAFETY ANALYSES

The containment isolation valve LCO was derived from the assumptions related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during major accidents. As part of the containment boundary, containment isolation valve OPERABILITY supports leak tightness of the containment. Therefore, the safety analyses of any event requiring isolation of containment is applicable to this LCO.

The DBAs that result in a release of radioactive material within containment are a Loss Of Coolant Accident (LOCA), secondary system pipe break, and fuel handling accident (Ref. 1). In the analyses for each of these accidents, it is assumed that containment isolation valves are either closed or function to close within the required isolation time following event initiation. This ensures that potential paths to the environment through containment isolation valves (including containment purge valves) are minimized. The safety analyses assume that the 48 inch purge valves are closed at event initiation.

In the calculation of control room and offsite doses following a LOCA, the accident analyses assume that 25% of the equilibrium radioactive iodine and 100% of the equilibrium radioactive noble gas inventory developed from maximum full power operation of the core is assumed to be immediately available for leakage from the containment. The containment is assumed to leak at the design leakage rate,  $L_a$ , at the peak accident pressure,  $P_a$ , for the first 24 hours and at  $0.5 L_a$  for the remaining duration of the accident (Ref. 2).

The containment isolation valves ensure that the containment design leakage rate remains within  $L_a$  by automatically isolating penetrations that do not serve post accident functions and providing isolation capability for penetrations associated with safe shutdown functions. The maximum isolation time for automatic containment isolation valves is 60 seconds (Ref. 1). This isolation time is based on engineering judgement since the control room and offsite dose calculations are performed assuming that the leakage from containment begins immediately following the accident.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The single failure criterion required to be imposed in the conduct of plant safety analyses was considered in the original design of the containment mini purge valves. Two valves in series on each mini purge line provide assurance that both the supply and exhaust lines could be isolated even if a single failure occurred. The inboard and outboard isolation valves on each line are provided with diverse power sources and solenoid operated valves that will fail closed on the loss of power or air. This arrangement was designed to preclude common mode failures from disabling both valves on a mini purge line.

The normal purge valves may be unable to close in the environment following a LOCA. Therefore, each of the normal purge valves is required to remain sealed closed during MODES 1, 2, 3, and 4. The requirement to seal closed the normal purge valves precludes a single failure from compromising the containment boundary as long as the system is operated in accordance with the subject LCO.

The containment isolation valves satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

Containment isolation valves (Table B 3.6.3-1) form a part of the containment boundary. The containment isolation valves' safety function is related to minimizing the loss of reactor coolant inventory and establishing the containment boundary during a DBA.

The automatic containment isolation valves are required to have isolation times within limits and to actuate on an automatic isolation signal. The 48 inch purge valves must be maintained sealed closed. The valves covered by this LCO are listed along with their associated stroke times in Table B 3.6.3-1.

BASES

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LCO (continued)

The normally closed containment isolation valves are considered OPERABLE when manual valves are closed or open under administrative controls, remote manual valves are closed, or automatic valves are de-activated and secured in their closed position. Other OPERABLE isolation devices include blind flanges are in place, and closed systems are intact. These passive isolation valves/devices are those listed in Reference 1.

Purge valves with resilient seals must meet additional leakage rate requirements. The other containment isolation valve leakage rates are addressed by LCO 3.6.1, "Containment," as Type C testing.

This LCO provides assurance that the containment isolation valves and purge valves will perform their designed safety functions to minimize the loss of reactor coolant inventory and establish the containment boundary during accidents.

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APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, the containment isolation valves (Table B 3.6.3-1) are not required to be OPERABLE in MODE 5. The requirements for containment isolation valves during MODE 6 are addressed in LCO 3.9.4, "Containment Penetrations."

## BASES

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### ACTIONS

The ACTIONS are modified by a Note allowing penetration flow paths, except for 48 inch purge valve penetration flow paths, to be unisolated intermittently under administrative controls. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room. In this way, the penetration can be rapidly isolated when a need for containment isolation is indicated. Due to the size of the containment purge line penetration and the fact that those penetrations exhaust directly from the containment atmosphere to the environment, the penetration flow path containing these valves may not be opened under administrative controls.

A second Note has been added to provide clarification that, for this LCO, separate Condition entry is allowed for each penetration flow path. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each inoperable containment isolation valve. Complying with the Required Actions may allow for continued operation, and subsequent inoperable containment isolation valves are governed by subsequent Condition entry and application of associated Required Actions.

The ACTIONS are further modified by a third Note, which ensures appropriate remedial actions are taken, if necessary, if the affected systems are rendered inoperable by an inoperable containment isolation valve.

In the event the containment isolation valve leakage results in exceeding the overall containment leakage rate, Note 4 directs entry into the applicable Conditions and Required Actions of LCO 3.6.1.

BASES

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ACTIONS (continued)

A.1 and A.2

In the event one containment isolation valve (Table B 3.6.3-1) in one or more penetration flow paths is inoperable, except for purge valve leakage not within limit, the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic or remote manual containment isolation valve, a closed manual valve, a blind flange, and a check valve with flow through the valve secured. De-activated remote manual valves may include, air operated valves with air removed, or de-energized motor operated valves. Automatic valves refer to those valves that require a motive force to actuate, such as air or electric, and receive an automatic actuation signal. Power operated valves require a motive force to actuate, such as air or electric, but do not receive an automatic actuation signal. Based on the design, the acceptable means of isolating the 48 inch purge valve penetration is to close and de-activate the 48 inch purge valve. For a penetration flow path isolated in accordance with Required Action A.1, the device used to isolate the penetration should be the closest available one to containment. Required Action A.1 must be completed within 4 hours. The 4 hour Completion Time is reasonable, considering the time required to isolate the penetration and the relative importance of supporting containment OPERABILITY during MODES 1, 2, 3, and 4.

BASES

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ACTIONS (continued)

For affected penetration flow paths that cannot be restored to OPERABLE status within the 4 hour Completion Time and that have been isolated in accordance with Required Action A.1, the affected penetration flow paths must be verified to be isolated on a periodic basis. This is necessary to ensure that containment penetrations required to be isolated following an accident and no longer capable of being automatically isolated will be in the isolation position should an event occur. This Required Action does not require any testing or device manipulation. Rather, it involves verification, through a system walkdown, that those isolation devices outside containment and capable of being mispositioned are in the correct position. The Completion Time of "once per 31 days for isolation devices outside containment" is appropriate considering the fact that the devices are operated under administrative controls and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is based on engineering judgment and is considered reasonable in view of the inaccessibility of the isolation devices and other administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

Condition A has been modified by a Note indicating that this Condition is only applicable to those penetration flow paths with two containment isolation valves. For penetration flow paths with only one containment isolation valve and a closed system, Condition C provides the appropriate actions.

BASES

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ACTIONS (continued)

Required Action A.2 is modified by two Notes. Note 1 applies to isolation devices located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or otherwise securing components is to ensure these devices are not inadvertently mispositioned. Therefore, the probability of misalignment of these devices once they have been verified to be in the proper position, is small.



BASES

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ACTIONS (continued)

B.1

With two containment isolation valves in one or more penetration flow paths inoperable, the affected penetration flow path must be isolated within 1 hour. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic or remote manual valve, a closed manual valve, and a blind flange. De-activated remote manual valves may include, air operated valves with air removed, or de-energized motor operated valves. Automatic valves refer to those valves that require a motive force to actuate, such as air or electric, and receive an automatic actuation signal. Power operated valves require a motive force to actuate, such as air or electric, but do not receive an automatic actuation signal. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1. In the event the affected penetration is isolated in accordance with Required Action B.1, the affected penetration must be verified to be isolated on a periodic basis per Required Action A.2, which remains in effect. This periodic verification is necessary to assure leak tightness of containment and that penetrations requiring isolation following an accident are isolated. The Completion Time of "once per 31 days for isolation devices outside containment" is appropriate considering the fact that the valves are operated under administrative control and the probability of their misalignment is low. For the isolation devices inside containment, the time period specified as "prior to entering MODE 4 from MODE 5 if not performed once within the previous 92 days" is based on engineering judgment and is considered reasonable in view of the administrative controls that will ensure that isolation device misalignment is an unlikely possibility.

Condition B is modified by a Note indicating this Condition is only applicable to penetration flow paths with two containment isolation valves. Condition A of this LCO addresses the condition of one containment isolation valve inoperable in this type of penetration flow path.

BASES

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ACTIONS (continued)

C.1 and C.2

With one or more penetration flow paths with one containment isolation valve inoperable, the inoperable valve flow path must be restored to OPERABLE status or the affected penetration flow path must be isolated. The method of isolation must include the use of at least one isolation barrier that cannot be adversely affected by a single active failure. Isolation barriers that meet this criterion are a closed and de-activated automatic or remote manual valve, a closed manual valve, and a blind flange. De-activated remote manual valves may include, air operated valves with air removed, or de-energized motor operated valves. Automatic valves refer to those valves that require a motive force to actuate, such as air or electric, and receive an automatic actuation signal. Power operated valves require a motive force to actuate, such as air or electric, but do not receive an automatic actuation signal. A check valve may not be used to isolate the affected penetration flow path. Required Action C.1 must be completed within the 72 hour Completion Time. The specified time period is reasonable considering the relative stability of the closed system (hence, reliability) to act as a penetration isolation boundary and the relative importance of maintaining containment integrity during MODES 1, 2, 3, and 4. In the event the affected penetration flow path is isolated in accordance with Required Action C.1, the affected penetration flow path must be verified to be isolated on a periodic basis. This periodic verification is necessary to assure leak tightness of containment and that containment penetrations requiring isolation following an accident are isolated. The Completion Time of once per 31 days for verifying that each affected penetration flow path is isolated is appropriate because the valves are operated under administrative controls and the probability of their misalignment is low.

BASES

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ACTIONS (continued)

Condition C is modified by a Note indicating that this Condition is only applicable to those penetration flow paths with only one containment isolation valve and a closed system. The closed system must meet the requirements of Reference 3. This Note is necessary since this Condition is written to specifically address those penetration flow paths in a closed system.

Required Action C.2 is modified by two Notes. Note 1 applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted. Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, sealing, or otherwise securing components is to ensure these devices are not inadvertently mispositioned. Therefore, the probability of misalignment of these valves, once they have been verified to be in the proper position, is small.

D.1

In the event one or more containment purge valves in one or more penetration flow paths are not within the purge valve leakage limits, purge valve leakage must be restored to within limits within 24 hours. If the leakage results in exceeding the overall containment leakage rate acceptance criteria, ACTIONS Note 4 would assure the more restrictive ACTIONS of LCO 3.6.1, "Containment," are applied. The specified Completion Time of 24 hours represents a reasonable time to effect repairs of leaking purge valve(s).

BASES

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ACTIONS (continued)

E.1 and E.2

If the Required Actions and associated Completion Times are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.3.1

Each 48 inch containment purge valve is required to be verified sealed closed at 31 day intervals. This Surveillance is designed to ensure that a gross breach of containment is not caused by an inadvertent or spurious opening of a containment purge valve. Detailed analysis of the purge valves failed to conclusively demonstrate their ability to close during a LOCA in time to limit offsite doses. Therefore, these valves are required to be in the sealed closed position during MODES 1, 2, 3, and 4. A containment purge valve that is sealed closed must have motive power to the valve operator removed. This can be accomplished by de-energizing the source of electric power or by installing a mechanical block. In this application, the term "sealed" has no connotation of leak tightness. The 31 day Frequency is consistent with other containment isolation valve requirements discussed in SR 3.6.3.3.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.3.2

This SR ensures that the minipurge valves are closed as required or, if open, open for an allowable reason under administrative control. If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits. The SR is not required to be met when the minipurge valves are open under administrative control. The valves may be opened for example; for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The minipurge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with other containment isolation valve requirements discussed in SR 3.6.3.3.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.3.3

This SR requires verification that each containment isolation manual valve, remote manual valve, and blind flange located outside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those containment isolation valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for containment isolation valves outside containment is relatively easy, the 31 day Frequency is based on engineering judgment and was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time the valves are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is small.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.3.4

This SR requires verification that each containment isolation manual valve, remote manual valve, and blind flange located inside containment and not locked, sealed, or otherwise secured and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside of the containment boundary is within design limits. For containment isolation valves inside containment, the Frequency of "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate since these containment isolation valves are operated under administrative controls and the probability of their misalignment is low. The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time they are open. This SR does not apply to valves that are locked, sealed, or otherwise secured in the closed position, since these were verified to be in the correct position upon locking, sealing, or securing.

This Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4, for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in their proper position, is small.

SR 3.6.3.5

Verifying that the isolation time of each automatic containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time test ensures the valve will isolate in a time period less than or equal to that assumed in the safety analyses. The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.3.6 and SR 3.6.3.7

For containment purge valves with resilient seals, additional leakage rate testing beyond the test requirements of 10 CFR 50, Appendix J, Option B, is required to ensure OPERABILITY. Operating experience has demonstrated that this type of seal has the potential to degrade in a shorter time period than do other seal types. Based on this observation and the importance of maintaining this penetration leak tight (due to the direct path between containment and the environment), a Frequency of 184 days was established for the 48 inch purge valves as part of the NRC resolution of Generic Issue B-20, "Containment Leakage Due to Seal Deterioration" (Ref. 4).

The 92 day Frequency was chosen for the 8 inch purge valves recognizing that cycling the valve could introduce additional seal degradation (beyond that occurring to a valve that has not been opened). Thus, decreasing the interval (from 184 days) is a prudent measure since the 8 inch purge valves may be opened periodically during the 92 day interval.

SR 3.6.3.8

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant 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 this Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.



BASES

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REFERENCES

1. UFSAR, Section 6.2.
2. Regulatory Guide 1.4, Revision 2.
3. Standard Review Plan 6.2.4.
4. Generic Issue B-20, "Containment Leakage Due to Seal Deterioration."

Containment Isolation Valves  
B 3.6.3

Table 3.6.3-1 (page 1 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION	MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
76	1AF013D <sup>(a)</sup>	1AF013D	S/G D Isol Vlv	N/A	3
99	2AF013D <sup>(a)</sup>	2AF013D	S/G D Isol Vlv	N/A	3
76	1AF013H <sup>(a)</sup>	1AF013H	S/G D Isol Vlv	N/A	3
99	2AF013H <sup>(a)</sup>	2AF013H	S/G D Isol Vlv	N/A	3
79	1AF013A <sup>(a)</sup>	1AF013A	S/G A Isol Vlv	N/A	3
100	2AF013A <sup>(a)</sup>	2AF013A	S/G A Isol Vlv	N/A	3
79	1AF013E <sup>(a)</sup>	1AF013E	S/G A Isol Vlv	N/A	3
100	2AF013E <sup>(a)</sup>	2AF013E	S/G A Isol Vlv	N/A	3
84	1AF013B <sup>(a)</sup>	1AF013B	S/G B Isol Vlv	N/A	3
101	2AF013B <sup>(a)</sup>	2AF013B	S/G B Isol Vlv	N/A	3
84	1AF013F <sup>(a)</sup>	1AF013F	S/G B Isol Vlv	N/A	3
101	2AF013F <sup>(a)</sup>	2AF013F	S/G B Isol Vlv	N/A	3
87	1AF013C <sup>(a)</sup>	1AF013C	S/G C Isol Vlv	N/A	3
102	2AF013C <sup>(a)</sup>	2AF013C	S/G C Isol Vlv	N/A	3
87	1AF013G <sup>(a)</sup>	1AF013G	S/G C Isol Vlv	N/A	3
102	2AF013G <sup>(a)</sup>	2AF013G	S/G C Isol Vlv	N/A	3
21	CC9414	CC9416 CC9534	CC From RC Pumps Isol Vlv CC From RC Pumps Isol Vlv CC From RC Pmp Isol Byp Check Vlv	10.0 10.0 N/A	1
22	CC9437B <sup>(a)</sup>	CC9437B	CC From Exc Ltdwn Hx Isol Vlv	10.0	3
24	CC685	CC9438 CC9518	CC From RC Pps Therm Bar Isol Vlv CC From RC Pps Therm Bar Isol Vlv CC Frm RC Pps Therm Barr Iso Byp Chk	10.0 10.0 N/A	1

(continued)

(a) Not subject to Type C leakage tests.

Containment Isolation Valves  
B 3.6.3

Table 3.6.3-1 (page 2 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION		MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
25	CC9413A	CC9486	CC9413A CC9486	CC To RC Pumps Isol Vlv CC Rx Support Cool Sup Hdr Chk Vlv	10.0 N/A	2
18	CC9437A <sup>(a)</sup>		CC9437A	CC To Exc Ltdwn Hx Isol Vlv	10.0	3
1	CS007A	CS008A	CS007A CS008A	Cnmt Spray Pp A Hdr Isol Vlv Cnmt Spray Hdr A Inbd Cnmt Check	30.0 N/A	2
16	CS007B	CS008B	CS007B CS008B	Cnmt Spray Pp B Hdr Isol Vlv Cnmt Spray Hdr B Inbd Cnmt Check	30.0 N/A	2
28	CV8100	CV8112 CV8113	CV8100 CV8112 CV8113	Seal Wtr Rtrn Cnmt Isol Vlv Seal Wtr Rtrn Cnmt Isol Vlv Seal Wtr Rtrn Check Vlv	10.0 10.0 N/A	1
33	CV8355A <sup>(a)</sup>	CV8368A <sup>(a)</sup>	CV8355A CV8368A	RCP Seal Injection Isol RCP Seal Injection Cnmt Isol Vlv	N/A N/A	2
33	CV8355D <sup>(a)</sup>	CV8368D <sup>(a)</sup>	CV8355D CV8368D	RCP Seal Injection Isol RCP Seal Injection Cnmt Isol Vlv	N/A N/A	2
37	CV8346 <sup>(a)</sup>	CV8348 <sup>(a)</sup>	CV8346 CV8348	Loop Fill Hdr Outbd Man Isol Vlv RC Loop Fill Cnmt Isol Vlv	N/A N/A	2
41	CV8152	CV8160	CV8152 CV8160	Letdown Line Cnmt Isol Vlv Letdown Line Cnmt Isol Vlv	10 10	2
53	CV8355B <sup>(a)</sup>	CV8368B <sup>(a)</sup>	CV8355B CV8368B	RCP Seal Injection RCP Seal Injection Cnmt Isol Vlv	N/A N/A	2
53	CV8355C <sup>(a)</sup>	CV8368C <sup>(a)</sup>	CV8355C CV8368C	RCP Seal Injection RCP Seal Injection Cnmt Isol Vlv	N/A N/A	2
71	CV8105 <sup>(a)</sup> CV8106 <sup>(a)</sup>		CV8105 CV8106	Chg Line Cnmt Isol Vlv Chg Line Cnmt Isol Vlv	10 10	10
32	FC011	FC012	FC011 FC012	Dem Loop Rtn To Rfuel Cav Cnmt Isol Dem Loop Rtn To Rfuel Cav Cnmt Isol	N/A N/A	2
57	FC010	FC009	FC010 FC009	Pp Suct From Refuel Cav Cnmt Isol Pp Suct From Refuel Cav Cnmt Isol	N/A N/A	2
34	FP010 <sup>(a)</sup>	FP345 <sup>(a)</sup>	FP010 FP345	Fire Protection O/S Isol 364 Vlv Fire Prot Cnmt Isol Vlv	12.0 N/A	2

(continued)

(a) Not subject to Type C leakage tests.

# Containment Isolation Valves B 3.6.3

Table 3.6.3-1 (page 3 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION	MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
76	FW009D <sup>(a)</sup> 2FW043D <sup>(a)</sup>	FW009D 2FW043D	FW Isolation Vlv Loop D S/G D FWIV Bypass Isol Vlv	5.0 6.0	3
79	FW009A <sup>(a)</sup> 2FW043A <sup>(a)</sup>	FW009A 2FW043A	FW Isolation Vlv Loop A S/G A FWIV Bypass Isol Vlv	5.0 6.0	3
84	FW009B <sup>(a)</sup> 2FW043B <sup>(a)</sup>	FW009B 2FW043B	FW Isolation Vlv Loop B S/G B FWIV Bypass Isol Vlv	5.0 6.0	3
87	FW009C <sup>(a)</sup> 2FW043C <sup>(a)</sup>	FW009C 2FW043C	FW Isolation Vlv Loop C S/G C FWIV Bypass Isol Vlv	5.0 6.0	3
76 76 99	1FW035D <sup>(a)</sup> 1FW039D <sup>(a)</sup> 1FW015D <sup>(a)</sup>	1FW035D 1FW039D 1FW015D	S/G D FW Temprng Isol Vlv S/G 1D Low Flow FW Isol Vlv S/G Recirc	6.0 6.0 N/A	3
99	2FW035D <sup>(a)</sup> 2FW039D <sup>(a)</sup> 2FW015D <sup>(a)</sup>	2FW035D 2FW039D 2FW015D	S/G D FW Temprng Isol Vlv S/G D FW Phtr Byp Vlv 377 DWST Isol SG D FW Chem Feed Isol	6.0 6.0 N/A	3
79 79 100	1FW035A <sup>(a)</sup> 1FW039A <sup>(a)</sup> 1FW015A <sup>(a)</sup>	1FW035A 1FW039A 1FW015A	S/G A FW Temprng Isol Vlv S/G 1A Low Flow FW Isol Vlv S/G Recirc	6.0 6.0 N/A	3
100	2FW035A <sup>(a)</sup> 2FW039A <sup>(a)</sup> 2FW015A <sup>(a)</sup>	2FW035A 2FW039A 2FW015A	S/G A FW Temprng Isol Vlv S/G A FW Phtr Byp Vlv 377 DWST Isol SG A FW Chem Feed Isol	6.0 6.0 N/A	3
84 84 101	1FW035B <sup>(a)</sup> 1FW039B <sup>(a)</sup> 1FW015B <sup>(a)</sup>	1FW035B 1FW039B 1FW015B	S/G B FW Temprng Isol Vlv S/G 1B Low Flow FW Isol Vlv S/G Recirc	6.0 6.0 N/A	3
101	2FW035B <sup>(a)</sup> 2FW039B <sup>(a)</sup> 2FW015B <sup>(a)</sup>	2FW035B 2FW039B 2FW015B	S/G B FW Temprng Isol Vlv S/G B FW Phtr Byp Vlv 377 DWST Isol SG B FW Chem Feed Isol	6.0 6.0 N/A	3
87 87 102	1FW035C <sup>(a)</sup> 1FW039C <sup>(a)</sup> 1FW015C <sup>(a)</sup>	1FW035C 1FW039C 1FW015C	S/G C FW Temprng Isol Vlv S/G 1C Low Flow FW Isol Vlv S/G Recirc	6.0 6.0 N/A	3
102	2FW035C <sup>(a)</sup> 2FW039C <sup>(a)</sup> 2FW015C <sup>(a)</sup>	2FW035C 2FW039C 2FW015C	S/G C FW Temprng Isol Vlv S/G C FW Phtr Byp Vlv 377 DWST Isol SG C FW Chem Feed Isol	6.0 6.0 N/A	3

(continued)

(a) Not subject to Type C leakage tests.

Containment Isolation Valves  
B 3.6.3

Table 3.6.3-1 (page 4 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION		MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
39	IA065	IA066 IA091	IA065 IA066 IA091	O/S Cnmt Isol Vlv Isol Vlv Instrument Air Inside Isol Vlv Upstrm IA Sply To AOV-IA066 Chk Vlv	15.0 15.0 N/A	1
77	MS101D <sup>(a)</sup> MS013D <sup>(a)</sup> MS014D <sup>(a)</sup> MS015D <sup>(a)</sup> MS016D <sup>(a)</sup> MS017D <sup>(a)</sup> MS018D <sup>(a)</sup> MS021D <sup>(a)</sup>		MS101D MS013D MS014D MS015D MS016D MS017D MS018D MS021D	MSIV Bypass Vlv Loop D SG D 1235 Psig Relief SG D 1220 Psig Relief SG D 1205 Psig Relief SG D 1190 Psig Relief SG D 1175 Psig Relief SG D PORV SG D Dripleg Drn DWST Isol	6.0 N/A N/A N/A N/A N/A 20.0 N/A	3
78	MS101A <sup>(a)</sup> MS013A <sup>(a)</sup> MS014A <sup>(a)</sup> MS015A <sup>(a)</sup> MS016A <sup>(a)</sup> MS017A <sup>(a)</sup> MS018A <sup>(a)</sup> MS021A <sup>(a)</sup>		MS101A MS013A MS014A MS015A MS016A MS017A MS018A MS021A	MSIV Bypass Vlv Loop A SG A 1235 Psig Relief SG A 1220 Psig Relief SG A 1205 Psig Relief SG A 1190 Psig Relief SG A 1175 Psig Relief SG A PORV SG A Dripleg Drn DWST Isol	6.0 N/A N/A N/A N/A N/A 20.0 N/A	3
85	MS101B <sup>(a)</sup> MS013B <sup>(a)</sup> MS014B <sup>(a)</sup> MS015B <sup>(a)</sup> MS016B <sup>(a)</sup> MS017B <sup>(a)</sup> MS018B <sup>(a)</sup> MS021B <sup>(a)</sup>		MS101B MS013B MS014B MS015B MS016B MS017B MS018B MS021B	MSIV Bypass Vlv Loop B SG B 1235 Psig Relief SG B 1220 Psig Relief SG B 1205 Psig Relief SG B 1190 Psig Relief SG B 1175 Psig Relief SG B PORV SG B Dripleg Drn DWST Isol	6.0 N/A N/A N/A N/A N/A 20.0 N/A	3
86	MS101C <sup>(a)</sup> MS013C <sup>(a)</sup> MS014C <sup>(a)</sup> MS015C <sup>(a)</sup> MS016C <sup>(a)</sup> MS017C <sup>(a)</sup> MS018C <sup>(a)</sup> MS021C <sup>(a)</sup>		MS101C MS013C MS014C MS015C MS016C MS017C MS018C MS021C	MSIV Bypass Vlv Loop C SG C 1235 Psig Relief SG C 1220 Psig Relief SG C 1205 Psig Relief SG C 1190 Psig Relief SG C 1175 Psig Relief SG C PORV SG C Dripleg Drn DWST Isol	6.0 N/A N/A N/A N/A N/A 20.0 N/A	3
13	OG082	OG079	OG082 OG079	H2 Recomb Outbd Cnmt Isol Vlv H2 Recomb Disch Cnmt Isol Vlv	60.0 60.0	2
13	OG084	OG080	OG084 OG080	H2 Recomb Outbd Cnmt Isol Vlv H2 Recomb Suct Cnmt Isol Vlv	60.0 60.0	2
23	OG085	OG081	OG085 OG081	H2 Recomb Outbd Cnmt Isol Vlv H2 Recomb Suction Cnmt Isol Vlv	60.0 60.0	2
69	OG083	OG057A	OG083 OG057A	H2 Recomb Outbd Cnmt Isol Vlv H2 Recomb Cnmt Isol Vlv	60.0 60.0	2

(continued)

(a) Not subject to Type C leakage tests.

# Containment Isolation Valves B 3.6.3

Table 3.6.3-1 (page 5 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION	MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
AL	PR033A PR033B	PR033A PR033B	Air Lck 426 Ins Air Lck Rad Mon Iso Air Lck 426 Ins Air Lck Rad Mon Iso	N/A N/A	10
AL	PR002E	PR002G	PR002E Air Lock 426 Air Mon Outlet Isol PR002G Air Lock Air Mon Outlet Check	N/A N/A	2
AL	PR033C PR033D	PR033C PR033D	Emg Air Lck Ins Air Lck Rad Mon Iso Emg Air Lck Ins Air Lck Rad Mon Iso	N/A N/A	10
AL	PR002F	PR002H	PR002F Air Lock 401 Air Mon Outlet Isol PR002H Emerg Hatch Air Lck Mon Outlet Chk	N/A N/A	2
52	PR001A PR001B	PR001A PR001B	UPST Cnmt Atmos To PR O/S Isol Vlv DWST Cnmt Atmos To PR O/S Isol Vlv	4.5 4.5	10
52	PR066	PR032	PR066 Sample Return O/S Cnmt Isol PR032 Cnmt Process Rad Mon Return Chk	5.0 N/A	2
36	PS228B PS229B	PS228B PS229B	Post LOCA H2 Mon B Cnmt Isol Vlv Post LOCA H2 Mon B Cnmt Isol Vlv	N/A <sup>(b)</sup> N/A <sup>(b)</sup>	10
36	PS230B	PS231B	PS230B Post LOCA H2 Mon B Cnmt Isol Vlv PS231B Post LOCA H2 Mon B Return Chk Vlv	N/A <sup>(b)</sup> N/A	2
45	PS228A PS229A	PS228A PS229A	Post LOCA H2 Mon A Cnmt Isol Vlv Post LOCA H2 Mon A Cnmt Isol Vlv	N/A <sup>(b)</sup> N/A <sup>(b)</sup>	10
45	PS230A	PS231A	PS230A Post LOCA H2 Mon A Cnmt Isol Vlv PS231A Post LOCA H2 Mon A Return Chk Vlv	N/A <sup>(b)</sup> N/A	2
70	PS9354B	PS9354A	PS9354B Pzr Stm Sample Cnmt Isol Vlv PS9354A Pzr Stm Sample Cnmt Isol Vlv	10.0 10.0	2
70	PS9355B	PS9355A	PS9355B Pzr Lqd Sample Cnmt Isol Vlv PS9355A Pzr Lqd Sample Cnmt Isol Vlv	10.0 10.0	2
70	PS9356B	PS9356A	PS9356B Loop Sample Cnmt Isol Vlv PS9356A Loop Sample Cnmt Isol Vlv	10.0 10.0	2
70	PS9357B	PS9357A	PS9357B Accumulator Sample Cnmt Isol Vlv PS9357A Accumulator Sample Cnmt Isol Vlv	10.0 10.0	2
11	RE9170	RE1003	RE9170 RCDT Pumps Outside Isol Vlv RE1003 RCDT Pumps Dsch Cnmt Inbd Isol Vlv	10.0 10.0	2

(continued)

(b) Proper valve operation will be demonstrated by verifying that the valve strokes to its required position.

# Containment Isolation Valves B 3.6.3

Table 3.6.3-1 (page 6 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION		MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
65	RE9157 RE9160B	RE9160A	RE9157 RE9160B RE9160A	RCDT N2 Supply Outside Isol Vlv RCDT Vent Outside Isol Vlv RCDT Vent A N2 Sup Inside Isol Vlv	10.0 10.0 10.0	4
65	RE9159B	RE9159A	RE9159B RE9159A	RCDT To Gas Anal Outside Isol Vlv RCDT To Gas Anal Inside Isol Vlv	10.0 10.0	2
47	RF027	RF026	RF027 RF026	Cnmt Flr Drn Sump Dsch Hdr O/S Isol Cnmt Flr Drn Sump Dsch Hdr I/S Isol	15.0 15.0	2
68		RH8701A <sup>(a)</sup> RH8701B <sup>(a)</sup>	RH8701A RH8701B	RC Loop A To RH PP A Suct 377 Isol RC Loop A To RH PP A Suct 377 Isol	N/A N/A	9
75		RH8702A <sup>(a)</sup> RH8702B <sup>(a)</sup>	RH8702A RH8702B	RC Loop C To RH PP B Suct 377 Isol RC Loop C To RH PP B Suct 377 Isol	N/A N/A	9
15	RY075		RY075	O/S CTMT Dead Weight Tester Isol	N/A	8
27	RY8025	RY8026	RY8025 RY8026	PRT To Gas Anal Cnmt Isol Vlv PRT To Gas Anal Cnmt Isol Vlv	10.0 10.0	2
27	RY8033	RY8047	RY8033 RY8047	N2 Supply To PRT Isol Vlv PRT N2 Supply Line I/S Cnmt Chk Vlv	10.0 N/A	2
44	RY8028	RY8046	RY8028 RY8046	PW To PRT Cnmt Isol Vlv PRT Spray Line Inside Cnmt Chk Vlv	10.0 N/A	2
56	SA032	SA033	SA032 SA033	Service Air Cnmt Isol Vlv O/S Service Air Inside Isol Vlv	4.5 4.5	2
80 80/81	SD002C <sup>(a)</sup> SD005B <sup>(a)</sup>		1SD002C 2SD002C SD005B	S/G 1C B/D Isol Steam Generator 1D Upper B/D Isol Steam Generator 1D B/D Sample Isol	7.5 7.5 3.0	3
81 80/81	SD002D <sup>(a)</sup> SD005B <sup>(a)</sup>		1SD002D 2SD002D SD005B	S/G 1D B/D Isol Steam Generator 1D Lower B/D Isol Steam Generator 1D B/D Sample Isol	7.5 7.5 3.0	3
82 82/83	SD002A <sup>(a)</sup> SD005A <sup>(a)</sup>		1SD002A 2SD002A SD005A	S/G 1A B/D Isol Steam Generator 1A Upper B/D Isol Steam Generator 1A B/D Sample Isol	7.5 7.5 3.0	3
83 82/83	SD002B <sup>(a)</sup> SD005A <sup>(a)</sup>		1SD002B 2SD002B SD005A	S/G 1A B/D Isol Steam Generator 1A Lower B/D Isol Steam Generator 1A B/D Sample Isol	7.5 7.5 3.0	3

(continued)

(a) Not subject to Type C leakage tests.

# Containment Isolation Valves B 3.6.3

Table 3.6.3-1 (page 7 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION	MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
88 88/89	SD002E <sup>(a)</sup> SD005C <sup>(a)</sup>	1SD002E 2SD002E SD005C	S/G 1B B/D Isol Steam Generator 1B Upper B/D Isol Steam Generator 1B B/D Sample Isol	7.5 7.5 3.0	3
89 88/89	SD002F <sup>(a)</sup> SD005C <sup>(a)</sup>	1SD002F 2SD002F SD005C	S/G 1B B/D Isol Steam Generator 1B Lower B/D Isol Steam Generator 1B B/D Sample Isol	7.5 7.5 3.0	3
90 90/91	SD002G <sup>(a)</sup> SD005D <sup>(a)</sup>	1SD002G 2SD002G SD005D	S/G 1C B/D Isol Steam Generator 1C Upper B/D Isol Steam Generator 1C B/D Sample Isol	7.5 7.5 3.0	3
91 90/91	SD002H <sup>(a)</sup> SD005D <sup>(a)</sup>	1SD002H 2SD002H SD005D	S/G 1C B/D Isol Steam Generator 1C Lower B/D Isol Steam Generator 1C B/D Sample Isol	7.5 7.5 3.0	3
26	SI8801A <sup>(a)</sup> SI8801B <sup>(a)</sup>	SI8815 <sup>(a)</sup> SI8843 <sup>(a)</sup>	SI8801A CHG Pp To Cold Legs Inj Isol SI8801B CHG Pp To Cold Legs Isol Vlv SI8815 Chg Pps Cold Leg Inj Hdr Chk Vlv SI8843 Accum Fill Frm SI Tst Line Isol Vlv	N/A N/A N/A N/A	5
50	SI8809A <sup>(a)</sup>	SI8890A <sup>(a)</sup> SI8818A <sup>(a)</sup> SI8818D <sup>(a)</sup>	SI8809A RH To Cold Legs A/D Isol Vlv SI8890A RHR To Cold Legs 1&4 Tst Line Iso Vl SI8818A SI Loop 1 Cold Leg Upst Chk Vlv SI8818D SI Loop 4 Cold Leg Upst Chk Vlv	N/A N/A N/A N/A	7
51	SI8809B <sup>(a)</sup>	SI8890B <sup>(a)</sup> SI8818B <sup>(a)</sup> SI8818C <sup>(a)</sup>	SI8809B RH To Cold Legs B/C Isol Vlv SI8890B RHR To Cold Legs 2&3 Tst Line Iso Vl SI8818B SI Loop 2 Cold Leg Upst Chk Vlv SI8818C SI Loop 3 Cold Leg Upst Chk Vlv	N/A N/A N/A N/A	7
55	SI8964 SI8888	SI8871	SI8964 SI Test Lines To Radwaste Isol Vlv SI8888 SI Pps To Accum Fill Line Isol Vlv SI8871 Fill/Test Line Isol Vlv	10.0 10.0 10.0	4
55	SI8880	SI8968	SI8880 SI Accumulators N2 Supply Isol Vlv SI8968 SI Accum N2 Supply Chk Vlv	10.0 N/A	2
59	SI8802A <sup>(a)</sup>	SI8881 <sup>(a)</sup> SI8905A <sup>(a)</sup> SI8905D <sup>(a)</sup>	SI8802A SI To Hot Legs A/D Isol Vlv SI8881 SI Test Line Iso Vlv, SI Pps To A/D Hot Legs SI8905A SI Loop 1 Hot Leg Upst Chk Vlv SI8905D SI Loop 4 Hot Leg Upst Chk Vlv	N/A N/A N/A N/A	7
60	SI8835 <sup>(a)</sup>	SI8823 <sup>(a)</sup> SI8819A <sup>(a)</sup> SI8819B <sup>(a)</sup> SI8819C <sup>(a)</sup> SI8819D <sup>(a)</sup>	SI8835 SI Pps Cold Legs Isol Vlv SI8823 SI Test Line Iso Vlv, SI Pps To Cold Legs SI8819A SI Pps Dsch Hdr To Cold Leg Lp 1 Chk SI8819B SI Pps Dsch Hdr To Cold Leg Lp 2 Chk SI8819C SI Pps Dsch Hdr To Cold Leg Lp 3 Chk SI8819D SI Pps Dsch Hdr To Cold Leg Lp 4 Chk	N/A N/A N/A N/A N/A	7

(continued)

(a) Not subject to Type C leakage tests.



# Containment Isolation Valves B 3.6.3

Table 3.6.3-1 (page 8 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION	MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
66	SI8840 <sup>(a)</sup>	SI8825 <sup>(a)</sup> SI8841A <sup>(a)</sup> SI8841B <sup>(a)</sup>	SI8840 RH To Hot Legs A/D Isol Vlv SI8825 RHR To Cold Legs 1&3 Tst Line Iso Vl SI8841A SI Loop 1 Hot Leg Upst Chk Vlv SI8841B SI Loop 3 Hot Leg Upst Chk Vlv	N/A N/A N/A N/A	7
73	SI8802B <sup>(a)</sup>	SI8824 <sup>(a)</sup> SI8905B <sup>(a)</sup> SI8905C <sup>(a)</sup>	SI8802B SI To Hot Legs B/C Isol Vlv SI8824 SI Test Line Iso Vlv, SI Pps To B/C Hot Legs SI8905B SI Loop 2 Hot Leg Upst Chk Vlv SI8905C SI Loop 3 Hot Leg Upst Chk Vlv	N/A N/A N/A N/A	7
92		SI8811A <sup>(a)</sup>	SI8811A Cnmt Sump A Isol Vlv	N/A	8
93		SI8811B <sup>(a)</sup>	SI8811B Cnmt Sump B Isol Vlv	N/A	8
7	SX016B <sup>(a)</sup>		SX016B Rx Cnmt Fan Cooler B/D SX Inlet	N/A	3
9	SX027B <sup>(a)</sup>		SX027B Rx Cnmt Fan Cooler B/D SX Outlet	N/A	3
14	SX027A <sup>(a)</sup>		SX027A Rx Cnmt Fan Cooler A/C SX Outlet	N/A	3
15	SX016A <sup>(a)</sup>		SX016A Rx Cnmt Fan Cooler A/C SX Inlet	N/A	3
13	VQ018	VQ016	VQ018 Int Leak Rate Cnmt Isol VQ016 Int Leak Rate Cnmt Isol	N/A N/A	2
13	VQ019	VQ017	VQ019 Int Leak Rate Cnmt Isol VQ017 Int Leak Rate Cnmt Isol	N/A N/A	2
94	VQ003 VQ005C VQ005B	VQ005A	VQ003 Cnmt Post-LOCA Purge Isol VQ005C Cnmt Mini-Flow Purge Exhaust Isol VQ005B Cnmt Mini-Flow Purge Exhaust Isol VQ005A Cnmt Mini-Flow Purge Exhaust Isol	5.0 5.0 5.0 5.0	6
95	VQ002B	VQ002A	VQ002B Cnmt Purge Exhaust Isol Vlv VQ002A Cnmt Purge Exhaust Isol Vlv	5.0 5.0	2 <sup>(c)</sup>
96	VQ004B	VQ004A	VQ004B Cnmt Mini-Flow Purge Supply Isol VQ004A Cnmt Mini-Flow Purge Supply Isol	5.0 5.0	2
97	VQ001B	VQ001A	VQ001B Cnmt Purge Supply Isol Vlv VQ001A Cnmt Purge Supply Isol Vlv	5.0 5.0	2 <sup>(c)</sup>
30	WM190	WM191	WM190 Demin Wtr Hdr To Cnmt DWST Isol WM191 Demin Wtr Hdr To Cnmt Check Vlv	N/A N/A	2

(continued)

(a) Not subject to Type C leakage tests.

(c) Valve INOPERABLE as a result of leakage not within limit, refer to Tech Spec 3.6.3, Condition D.

Containment Isolation Valves  
B 3.6.3

Table 3.6.3-1 (page 9 of 9)  
Primary Containment Isolation Valves

PENETRATION NUMBER	OUTSIDE VALVE	INSIDE VALVE	FUNCTION		MAXIMUM ISOLATION TIME (SEC)	Table B 3.6.3-2 ACTION
5	W0020A	W0056A	W0020A W0056A	Rx Cnmt Fn Coolers A/C Chl Wtr Out Rx Cnmt Fn Coolers A/C Chl Wtr Out	50.0 50.0	2
6	W0006A	W0007A	W0006A W0007A	Rx Cnmt Fn Coolers A/C Chl Wtr In A/C RCFC Supply Hdr Incnmt Check	50.0 N/A	2
8	W0020B	W0056B	W0020B W0056B	Rx Cnmt Fn Coolers B/D Chl Wtr Out Rx Cnmt Fn Coolers B/D Chl Wtr Out	50.0 50.0	2
10	W0006B	W0007B	W0006B W0007B	Rx Cnmt Fn Coolers B/D Chl Wtr In B/D RCFC Supply Hdr Incnmt Check	50.0 N/A	2

Containment Isolation Valves  
B 3.6.3

Table 3.6.3-2 (page 1 of 1)  
Primary Containment Isolation Valves

ACTION NUMBER	STATUS OF AFFECTED CONTAINMENT ISOLATION VALVE(S)	APPLICABLE LCO 3.6.3 CONDITION
1	a. Outside valve <u>OR</u> either inside valve INOPERABLE b. Both inside valves INOPERABLE c. Outside <u>AND</u> either inside valve INOPERABLE	A A B
2	a. Outside valve <u>OR</u> inside valve INOPERABLE b. Outside valve <u>AND</u> inside valve INOPERABLE	A B
3	a. Valve INOPERABLE	C
4	a. Inside valve <u>OR</u> either outside valve INOPERABLE b. Both outside valves INOPERABLE c. Inside valve <u>AND</u> either outside valve INOPERABLE	A A B
5	a. Either of the outside valves <u>OR</u> either of the inside valves INOPERABLE b. Both inside valves <u>OR</u> both outside valves INOPERABLE c. Either of the inside valves <u>AND</u> either of the outside valves INOPERABLE	A A B
6	a. 1 <u>OR</u> more outside valves INOPERABLE b. Inside valve INOPERABLE c. Inside valve <u>AND</u> any outside valve(s) INOPERABLE	A A B
7	a. 1 <u>OR</u> more inside valves INOPERABLE b. Outside valve INOPERABLE c. Outside valve <u>AND</u> any inside valve(s) INOPERABLE	A A B
8	a. Valve INOPERABLE	B
9	a. 1 inside valve INOPERABLE b. Both inside valves INOPERABLE	A B
10	a. 1 outside valve INOPERABLE b. Both outside valves INOPERABLE	A B

B 3.6 CONTAINMENT SYSTEMS

B 3.6.4 Containment Pressure

BASES

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BACKGROUND

The containment structure serves to contain radioactive material that may be released from the reactor core following a Design Basis Accident (DBA). The containment pressure is limited during normal operation to preserve the initial conditions assumed in the accident analyses for a Loss Of Coolant Accident (LOCA) or Steam Line Break (SLB). These limits also prevent the containment pressure from exceeding the containment design negative pressure differential with respect to the outside atmosphere in the event of inadvertent actuation of the Containment Spray System.

Containment pressure is a process variable that is monitored and controlled. The containment pressure limits are derived from the input conditions used in the containment functional analyses and the containment structure external pressure analysis. Should operation occur outside these limits coincident with a Design Basis Accident (DBA), post accident containment pressures could exceed calculated values.

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APPLICABLE  
SAFETY ANALYSES

Containment internal pressure is an initial condition used in the DBA analyses to establish the maximum peak containment internal pressure. The limiting DBAs considered, relative to containment pressure, are the LOCA and SLB, which are analyzed using computer modeled pressure transients. The worst case LOCA generates larger mass and energy release than the worst case SLB. Thus, the LOCA event bounds the SLB event from the containment peak pressure standpoint (Ref. 1).

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The initial pressure condition used in the containment analysis was 0.3 psig. Evaluations performed showed that if the initial pressure was raised to 1 psig the maximum peak pressure from a LOCA was 47.8 psig for Unit 1 and 44.4 psig for Unit 2. The containment analysis (Ref. 1) shows that the maximum peak calculated containment pressure,  $P_a$ , results from the limiting LOCA. The maximum containment pressure resulting from the worst case LOCA does not exceed the containment design pressure, 50 psig.

The containment was also evaluated for an external pressure load equivalent to -3.5 psig (Ref. 2). The inadvertent actuation of the Containment Spray System was analyzed to determine the resulting reduction in containment pressure. The initial pressure condition used in this analysis was 0.0 psig. This resulted in a minimum pressure inside containment of -3.48 psig, which is less than the design load.

For certain aspects of transient accident analyses, maximizing the calculated containment pressure is not conservative. In particular, the cooling effectiveness of the Emergency Core Cooling System during the core reflood phase of a LOCA analysis increases with increasing containment backpressure. Therefore, for the reflood phase, the containment backpressure is calculated in a manner designed to conservatively minimize, rather than maximize, the containment pressure response in accordance with 10 CFR 50, Appendix K (Ref. 3).

Containment pressure satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO                      Maintaining containment pressure at less than or equal to the LCO upper pressure limit ensures that, in the event of a DBA, the resultant peak containment accident pressure will remain below the containment design pressure. Maintaining containment pressure at greater than or equal to the LCO lower pressure limit provides reasonable assurance that the containment will not exceed the design negative differential pressure following the inadvertent actuation of the Containment Spray System.

---

APPLICABILITY        In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. Since maintaining containment pressure within limits is essential to ensure initial conditions assumed in the accident analyses are maintained, the LCO is applicable in MODES 1, 2, 3, and 4.

                            In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining containment pressure within the limits of the LCO is not required in MODES 5 or 6.

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ACTIONS                A.1

                            When containment pressure is not within the limits of the LCO, it must be restored to within these limits within 1 hour. The Required Action is necessary to return operation to within the bounds of the containment analysis. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1, "Containment," which requires that containment be restored to OPERABLE status within 1 hour.

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BASES

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ACTIONS (continued)

B.1 and B.2

If containment pressure cannot be restored to within limits within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.4.1

Verifying that containment pressure is within limits ensures that unit operation remains within the limits assumed in the containment analysis. The 12 hour Frequency of this SR was developed based on operating experience related to trending of containment pressure variations during the applicable MODES. Furthermore, the 12 hour Frequency is considered adequate in view of other indications available in the control room, including alarms, to alert the operator to an abnormal containment pressure condition.

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REFERENCES

1. UFSAR, Section 6.2.
2. Safety Evaluation Report Related to the Operation of Byron Station Units 1 and 2, Supplement 2.
3. 10 CFR 50, Appendix K.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.5 Containment Air Temperature

#### BASES

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##### BACKGROUND

The containment structure serves to contain radioactive material that may be released from the reactor core following a Design Basis Accident (DBA). The containment average air temperature is limited during normal operation to preserve the initial conditions assumed in the accident analyses for a Loss of Coolant Accident (LOCA) or Steam Line Break (SLB).

The containment average air temperature limit is derived from the input conditions used in the containment functional analyses and the containment structure external pressure analyses. This LCO ensures that initial conditions assumed in the analysis of containment response to a DBA are not violated during unit operations. The total amount of energy to be removed from containment by the Containment Spray and Cooling Systems during post accident conditions is dependent upon the energy released to the containment due to the event, as well as the initial containment temperature and pressure. The higher the initial temperature, the more energy that must be removed, resulting in higher peak containment pressure and temperature. Exceeding containment design pressure may result in leakage greater than that assumed in the accident analysis. Operation with containment temperature in excess of the LCO limit violates an initial condition assumed in the accident analysis.

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##### APPLICABLE SAFETY ANALYSES

Containment average air temperature is an initial condition used in the DBA analyses and is an important consideration in establishing the containment environmental qualification operating envelope for both pressure and temperature. The limit for containment average air temperature ensures that operation is maintained within the assumptions used in the DBA analyses for containment (Ref. 1).



BASES

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APPLICABLE SAFETY ANALYSES (continued)

The limiting DBAs considered relative to containment OPERABILITY are the LOCA and SLB. The DBA LOCA and SLB are analyzed using computer codes designed to predict the resultant containment pressure transients. No two DBAs are assumed to occur simultaneously or consecutively. The postulated DBAs are analyzed with regard to Engineered Safety Feature (ESF) Systems, assuming the loss of one ESF bus, which is the worst case single active failure, resulting in one train each of the Containment Spray System, Residual Heat Removal System, and Containment Cooling System being rendered inoperable.

The limiting DBA for the maximum peak containment air temperature is an SLB. The initial containment average air temperature assumed in the design basis analyses (Ref. 1) is 120°F. This resulted in a maximum containment air temperature of 319.7°F. The design temperature of the containment structure is 280°F. The maximum peak containment air temperature was calculated to exceed the containment design temperature for only a few seconds during the transient. Thermal analyses showed that the time interval during which the containment air temperature exceeded the containment design temperature was short enough that the containment temperatures remained below the design temperature. The basis of the containment design temperature, however, is to ensure the performance of safety related equipment inside containment (Ref. 2). Therefore, it is concluded that the calculated transient containment air temperature is acceptable for the DBA SLB.

The containment average air temperature limit is also used to establish the environmental qualification operating envelope for containment. The temperature limit is also used in the depressurization analyses to ensure that the minimum pressure limit is maintained following an inadvertent actuation of the Containment Spray System (Ref. 1).

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The containment pressure transient is sensitive to the initial air mass in containment and, therefore, to the initial containment air temperature. The limiting DBA for establishing the maximum peak containment internal pressure is a LOCA. The temperature limit is used in this analysis to ensure that in the event of an accident the maximum containment internal pressure will not be exceeded.

Containment average air temperature satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

During a DBA, with an initial containment average air temperature less than or equal to the LCO temperature limit, the resultant peak accident temperature is maintained below the evaluated containment temperatures. As a result, the ability of containment to perform its design function is ensured.

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APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, maintaining containment average air temperature within the limit is not required in MODES 5 or 6.

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ACTIONS

A.1

When containment average air temperature is not within the limit of the LCO, it must be restored to within limit within 8 hours. This Required Action is necessary to return operation to within the bounds of the containment analysis. The 8 hour Completion Time is acceptable considering the sensitivity of the analysis to variations in this parameter and provides sufficient time to correct minor problems.

BASES

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ACTIONS (continued)

B.1 and B.2

If the containment average air temperature cannot be restored to within its limit within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.5.1

Verifying that containment average air temperature is within the LCO limit ensures that containment operation remains within the limit assumed for the containment analyses. In order to determine the containment average air temperature, an arithmetic average is calculated using measurements taken at locations within the containment selected to provide a conservative estimate of the overall containment atmosphere (e.g., the dry bulb inlet temperature of the running reactor containment fan coolers). The 24 hour Frequency of this SR is considered acceptable based on observed slow rates of temperature increase within containment as a result of environmental heat sources (due to the large volume of containment). Furthermore, the 24 hour Frequency is considered adequate in view of other indications available in the control room to alert the operator to an abnormal containment temperature condition.

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REFERENCES

1. UFSAR, Section 6.2.
2. 10 CFR 50.49.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.6 Containment Spray and Cooling Systems

#### BASES

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#### BACKGROUND

The Containment Spray and Containment Cooling Systems provide containment atmosphere cooling to limit post accident pressure and temperature in containment to less than the design values. Reduction of containment pressure and the iodine removal capability of the spray reduces the release of fission product radioactivity from containment to the environment, in the event of a Design Basis Accident (DBA), to within limits. The Containment Spray and Containment Cooling Systems are designed to meet the requirements of 10 CFR 50, Appendix A, GDC 38, "Containment Heat Removal," GDC 39, "Inspection of Containment Heat Removal Systems," GDC 40, "Testing of Containment Heat Removal Systems," GDC 41, "Containment Atmosphere Cleanup," GDC 42, "Inspection of Containment Atmosphere Cleanup Systems," and GDC 43, "Testing of Containment Atmosphere Cleanup Systems" (Ref. 1).

The Containment Cooling System and Containment Spray System are Engineered Safety Feature (ESF) Systems and are discussed in UFSAR, Sections 9.4.8 and 6.5.2, respectively (Refs. 2 and 3). They are designed to ensure that the heat removal capability required during the post accident period can be attained. The Containment Spray System in conjunction with the Containment Cooling System limit and maintain post accident conditions to less than the containment design values. In addition, the Containment Spray System and Containment Cooling System provide an alternate hydrogen control function to the hydrogen recombiners, hydrogen mixing, during post Loss Of Coolant Accident (LOCA) conditions.

BASES

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BACKGROUND (continued)

Containment Spray System

The Containment Spray System consists of two separate 100% capacity trains, each capable of meeting the design bases. Each train includes a containment spray pump, spray headers, nozzles, valves, and piping. Each train is powered from a separate ESF bus. The Refueling Water Storage Tank (RWST) supplies borated water to the Containment Spray System during the injection phase of operation. In the recirculation mode of operation, containment spray pump suction is transferred from the RWST to the containment sump(s).

The Containment Spray System provides a spray of cold borated water mixed with sodium hydroxide (NaOH) from the spray additive tank into the upper regions of containment to reduce the containment pressure and temperature and to reduce fission products from the containment atmosphere during a DBA. The RWST solution temperature is an important factor in determining the heat removal capability of the Containment Spray System during the injection phase. In the recirculation mode of operation, heat is removed from the containment sump water by the residual heat removal heat exchangers. Each train of the Containment Spray System provides adequate spray coverage to meet the system design requirements for containment heat removal.

The Spray Additive System injects an NaOH solution into the spray. The resulting alkaline pH of the spray enhances the ability of the spray to scavenge fission products from the containment atmosphere. The NaOH added in the spray also ensures an alkaline pH for the solution recirculated in the containment sump. The pH band of the containment sump water minimizes the evolution of iodine while minimizing the occurrence of chloride and caustic stress corrosion on mechanical systems and components exposed to the fluid. The chemical aspects of iodine removal capability are addressed in LCO 3.6.7, "Spray Additive System."

BASES

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BACKGROUND (continued)

The Containment Spray System is actuated either automatically by a containment High-3 pressure signal or manually. An automatic actuation opens the containment spray pump discharge valves, starts the two containment spray pumps, and begins the injection phase. A manual actuation of the Containment Spray System requires the operator to actuate two separate switches on the main control board to begin the same sequence. The injection phase continues until an RWST LO-3 alarm is received, and the operator manually aligns the system to the recirculation mode. The Containment Spray System in the recirculation mode maintains an equilibrium temperature between the containment atmosphere and the recirculated sump water. Operation of the Containment Spray System in the recirculation mode is controlled by the operator in accordance with the emergency operating procedures.

Containment Cooling System

Two trains of containment cooling, each of sufficient capacity to supply 100% of the design cooling requirement, are provided. Each train consisting of two Reactor Containment Fan Coolers (RCFCs) is supplied with cooling water from a separate train of Essential Service Water (SX) and is powered from a separate ESF bus. During all operating conditions, air is drawn from the upper volume of the containment approximately 50 feet above the operating floor by a return air riser (one riser for each RCFC unit). The return air is then routed through the SX cooling coils, the Chilled Water (WO) cooling coils, and the fan and discharge duct (one for each RCFC unit). The RCFC discharges directly into the lower containment volume. The WO chiller unit condensers are served by the SX return from the RCFC SX cooling coils. Upon receipt of an ESF signal, the WO condensers are automatically isolated from SX.

Containment Cooling System train A consists of RCFC A and C; and train B consists of RCFC B and D.

BASES

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BACKGROUND (continued)

During normal operation, the fans are operated at high speed with SX supplied to the cooling coils. The Containment Cooling System is designed to limit the ambient containment air temperature during normal unit operation to less than the limit specified in LCO 3.6.5, "Containment Air Temperature." This temperature limitation ensures that the containment temperature does not exceed the initial temperature conditions assumed for the DBAs.

In post accident operation following an actuation signal, the Containment Cooling System fans are designed to start automatically in slow speed if not already running. If running in high (normal) speed, the fans automatically shift to slow speed. The fans are operated at the lower speed during accident conditions to prevent adverse fan conditions (e.g., motor overload, increased blade stresses) from the higher mass atmosphere. The temperature of the SX is an important factor in the heat removal capability of the fan units.

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APPLICABLE  
SAFETY ANALYSES

The Containment Spray System and Containment Cooling System limit the temperature and pressure that could be experienced following a DBA. The limiting DBAs considered are the LOCA and the Steam Line Break (SLB). The LOCA and SLB are analyzed using computer codes designed to predict the resultant containment pressure and temperature transients. No DBAs are assumed to occur simultaneously or consecutively. The postulated DBAs are analyzed with regard to containment ESF systems, assuming the loss of one ESF bus, which is the worst case single active failure and results in one train of the Containment Spray System and Containment Cooling System being rendered inoperable.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The analysis and evaluation show that under the worst case scenario, the highest peak containment pressure is 47.8 psig for Unit 1 and 44.4 psig for Unit 2 (experienced during a LOCA). The analysis shows that the peak containment temperature is 319.7°F (experienced during an SLB). Both results meet the intent of the design basis. (See the Bases for LCO 3.6.4, "Containment Pressure," and LCO 3.6.5 for a detailed discussion.) The analyses and evaluations assume a unit specific power level of 3579 MWt, one containment spray train and one containment cooling train operating, and initial (pre-accident) containment conditions of 120°F and 0.3 psig. Evaluations were performed that showed if the initial pressure was raised to 1 psig the maximum peak pressure would be 47.8 psig for Unit 1 and 44.4 psig for Unit 2. The analyses also assume a response time delayed initiation to provide conservative peak calculated containment pressure and temperature responses.

For certain aspects of transient accident analyses, maximizing the calculated containment pressure is not conservative. In particular, the effectiveness of the Emergency Core Cooling System during the core reflood phase of a LOCA analysis increases with increasing containment backpressure. For these calculations, the containment backpressure is calculated in a manner designed to conservatively minimize, rather than maximize, the calculated transient containment pressures in accordance with 10 CFR 50, Appendix K (Ref. 4).

The effect of an inadvertent containment spray actuation has been analyzed. An inadvertent spray actuation results in a -3.48 psig containment pressure and is associated with the sudden cooling effect in the interior of the leak tight containment. Additional discussion is provided in the Bases for LCO 3.6.4.

The modeled Containment Spray System actuation from the containment analysis is based on a response time associated with exceeding the containment High-3 pressure setpoint to achieving full flow through the containment spray nozzles. The Containment Spray System total response time of 58 seconds includes Diesel Generator (DG) startup (for loss of offsite power), sequencing of equipment, containment spray pump startup, and spray line filling (Ref. 5).



BASES

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APPLICABLE SAFETY ANALYSES (continued)

Containment cooling train performance for post accident conditions is given in Reference 6. The result of the analysis is that each train can provide 100% of the required peak cooling capacity during the post accident condition. The train post accident cooling capacity under varying containment ambient conditions, required to perform the accident analyses, is also shown in Reference 7.

The modeled Containment Cooling System actuation from the containment analysis is based upon a response time associated with exceeding the containment High-3 pressure setpoint to achieving full Containment Cooling System air and safety grade cooling water flow. The Containment Cooling System total response time of 40 seconds, includes signal delay, DG startup (for loss of offsite power), and service water pump startup times (Ref. 5).

The Containment Spray System and the Containment Cooling System satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

During a DBA, a minimum of one containment cooling train and one containment spray train are required to maintain the containment peak pressure and temperature below the design limits (Ref. 7). Additionally, one containment spray train is also required to remove iodine from the containment atmosphere and maintain concentrations below those assumed in the safety analysis. To ensure that these requirements are met, two containment spray trains and two containment cooling trains must be OPERABLE. The chemical aspects of iodine removal capability are addressed in LCO 3.6.7. Therefore, in the event of an accident, at least one train in each system operates, assuming the worst case single active failure occurs.

Each Containment Spray System includes a spray pump, spray headers, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the RWST upon an ESF actuation signal and manually transferring suction to the containment sump.

BASES

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LCO (continued)

Each Containment Cooling System includes cooling coils, dampers, fans, instruments, and controls to ensure an OPERABLE flow path.

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APPLICABILITY      In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment and an increase in containment pressure and temperature requiring the operation of the containment spray trains and containment cooling trains.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the Containment Spray System and the Containment Cooling System are not required to be OPERABLE in MODES 5 and 6.

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ACTIONS

A.1

With one containment spray train inoperable, the inoperable containment spray train must be restored to OPERABLE status within 7 days. In this Condition, the remaining OPERABLE spray and cooling trains are adequate to perform the iodine removal and containment cooling functions. The 7 day Completion Time takes into account the redundant heat removal capability afforded by the Containment Spray System, reasonable time for repairs, and low probability of a DBA occurring during this period.

The 14 day portion of the Completion Time for Required Action A.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3, "Completion Times," for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

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BASES

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ACTIONS (continued)

B.1 and B.2

If the inoperable containment spray train cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray train and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

C.1

With one or more of the containment cooling trains inoperable, the inoperable containment cooling train(s) must be restored to OPERABLE status within 7 days. The OPERABLE components in this degraded condition provide iodine removal capabilities and provide a redundant cooling system for heat removal needs. The 7 day Completion Time was developed taking into account the heat removal capabilities afforded by the Containment Spray System and the low probability of DBA occurring during this period.

The 14 day portion of the Completion Time for Required Action C.1 is based upon engineering judgment. It takes into account the low probability of coincident entry into two Conditions in this Specification coupled with the low probability of an accident occurring during this time. Refer to Section 1.3 for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time.

BASES

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ACTIONS (continued)

D.1 and D.2

If the Required Action and associated Completion Time of Condition C of this LCO are not met, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

E.1

With two containment spray trains or any combination of three or more containment spray and cooling trains inoperable, the unit is in a condition outside the accident analysis. Therefore, LCO 3.0.3 must be entered immediately.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment for manual, power operated, and automatic valves in the containment spray flow path provides assurance that the proper flow paths will exist for Containment Spray System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those valves outside containment (only check valves are inside containment) and capable of potentially being mispositioned are in the correct position.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.6.2

Operating each containment cooling train fan unit (in slow speed) for  $\geq 15$  minutes ensures that all trains are OPERABLE and that all associated controls are functioning properly. It also ensures that blockage, fan or motor failure, or excessive vibration can be detected for corrective action. The 31 day Frequency was developed considering the known reliability of the fan units and controls, the two train redundancy available, and the low probability of significant degradation of the containment cooling train occurring between surveillances. It has also been shown to be acceptable through operating experience.

SR 3.6.6.3

Verifying that each containment cooling train SX cooling flow rate to each cooling unit is  $\geq 2660$  gpm provides assurance that the design flow rate assumed in the safety analyses will be achieved. The Frequency was developed considering the known reliability of the SX System, the two train redundancy available, and the low probability of a significant degradation of flow occurring between surveillances.

SR 3.6.6.4

Verifying each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head (resulting in 265 psig discharge pressure) ensures that spray pump performance has not degraded during the cycle. Flow and differential pressure are normal tests of centrifugal pump performance required by SECTION XI of the ASME Code (Ref. 8). Since the containment spray pumps cannot be tested with flow through the spray headers, they are tested on recirculation flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by abnormal performance. The Frequency of the SR is in accordance with the Inservice Testing Program.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.6.5 and SR 3.6.6.6

These SRs require verification that each automatic containment spray valve actuates to its correct position and that each containment spray pump starts upon receipt of an actual or simulated actuation of a containment High-3 pressure signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 18 month Frequency is based on the need to perform these Surveillances under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillances were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillances when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

The surveillance of containment sump isolation valves is also required by SR 3.5.2.5. A single surveillance may be used to satisfy both requirements.

SR 3.6.6.7

This SR requires verification that each containment cooling train actuates upon receipt of an actual or simulated safety injection signal. The 18 month Frequency is based on engineering judgment and has been shown to be acceptable through operating experience. See SR 3.6.6.5 and SR 3.6.6.6, above, for further discussion of the basis for the 18 month Frequency.

SR 3.6.6.8

With the containment spray inlet valves closed and the spray header drained of any solution, low pressure air or smoke can be blown through test connections. This SR ensures that each spray nozzle is unobstructed and provides assurance that spray coverage of the containment during an accident is not degraded. Due to the passive design of the nozzle, a test at 10 year intervals is considered adequate to detect obstruction of the nozzles.

BASES

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 38, GDC 39, GDC 40, GDC 41, GDC 42, and GDC 43.
2. UFSAR, Section 9.4.8.
3. UFSAR, Section 6.5.2.
4. 10 CFR 50, Appendix K.
5. UFSAR, Section 6.2.1.1.3.
6. UFSAR, Section 6.2.2.
7. UFSAR, Section 6.2.
8. ASME, Boiler and Pressure Vessel Code, SECTION XI.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.7 Spray Additive System

#### BASES

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##### BACKGROUND

The Spray Additive System is a subsystem of the Containment Spray System that assists in reducing the iodine fission product inventory in the containment atmosphere resulting from a Design Basis Accident (DBA) and is described in UFSAR Section 6.5.2 (Ref. 1).

Radioiodine in its various forms is the fission product of primary concern in the evaluation of a DBA. It is absorbed by the spray from the containment atmosphere. To enhance the iodine absorption capacity of the spray, the spray solution is adjusted to an alkaline pH that promotes iodine hydrolysis, in which iodine is converted to nonvolatile forms. Because of its stability when exposed to radiation and elevated temperature, sodium hydroxide (NaOH) is the preferred spray additive. The NaOH added to the spray also ensures an equilibrium sump pH value of  $\geq 8.0$  and  $\leq 11.0$  of the solution recirculated from the containment sump. This pH band minimizes the evolution of iodine, while minimizing the occurrence of chloride and caustic stress corrosion on mechanical systems and components.

The Spray Additive System consists of one spray additive tank that is shared by the two trains of spray additive equipment. Each train of equipment provides a flow path from the spray additive tank to a containment spray pump and consists of an eductor for each containment spray pump, valves, instrumentation, and connecting piping. Each eductor draws the NaOH spray solution from the common tank using a portion of the borated water discharged by the containment spray pump as the motive flow. The eductor mixes the NaOH solution and the borated water and discharges the mixture into the spray pump suction line. The eductors are designed to ensure that the pH of the spray mixture is between 8.5 and 12.8.



## BASES

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### BACKGROUND (continued)

The Containment Spray System actuation signal opens the valves from the spray additive tank to the eductor (CS019A/B), the discharge valve to the eductor from the CS pump discharge (CS010A/B), if not already open, and the isolation valve into containment (CS007A/B); in addition to starting the CS pumps. The 30% to 36% NaOH solution is drawn into the spray pump suctions. The spray additive tank capacity provides for the addition of NaOH solution to all of the water sprayed from the Refueling Water Storage Tank (RWST) into containment. The percent solution and volume of solution sprayed into containment ensures a long term containment sump pH of  $\geq 8.0$  and  $\leq 11.0$ . This ensures the continued iodine retention effectiveness of the sump water during the recirculation phase of spray operation and also minimizes the occurrence of chloride induced stress corrosion cracking of the stainless steel recirculation piping.

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### APPLICABLE SAFETY ANALYSES

The Spray Additive System is essential to the removal of airborne iodine within containment following a DBA.

Following the assumed release of radioactive materials into containment, the containment is assumed to leak at its design value volume following the accident. The analysis assumes that 100% of containment is covered by the spray (Ref. 2).

The DBA response time assumed for the Spray Additive System is the same as for the Containment Spray System and is discussed in the Bases for LCO 3.6.6, "Containment Spray and Cooling Systems."

The DBA analyses assume that one train of the Containment Spray System/Spray Additive System is inoperable and that the entire spray additive tank volume is added to the remaining Containment Spray System flow path.

The Spray Additive System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO                      The Spray Additive System is necessary to reduce the release of radioactive material to the environment in the event of a DBA. To be considered OPERABLE, the volume and concentration of the spray additive solution must be sufficient to provide NaOH injection into the spray flow until the Containment Spray System suction path is switched from the RWST to the containment sump, and to raise the average spray solution pH to a level conducive to iodine removal, namely, to  $\geq 8.0$  and  $\leq 11.0$ . This pH range maximizes the effectiveness of the iodine removal mechanism without introducing conditions that may induce caustic stress corrosion cracking of mechanical system components. In addition, it is essential that valves in the Spray Additive System flow paths are properly positioned and that automatic valves are capable of activating to their correct positions.

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APPLICABILITY                      In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material to containment requiring the operation of the Spray Additive System. The Spray Additive System assists in reducing the iodine fission product inventory prior to release to the environment.

   In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations in these MODES. Thus, the Spray Additive System is not required to be OPERABLE in MODE 5 or 6.

---

ACTIONS                      A.1

   If the Spray Additive System is inoperable, it must be restored to OPERABLE within 7 days. The pH adjustment of the Containment Spray System flow for corrosion protection and iodine removal enhancement is reduced in this condition. The Containment Spray System would still be available and would remove some iodine from the containment atmosphere in the event of a DBA. The 7 day Completion Time takes into account the redundant flow path capabilities and the low probability of the worst case DBA occurring during this period.

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BASES

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ACTIONS (continued)

B.1 and B.2

If the Spray Additive System cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 84 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems. The extended interval to reach MODE 5 allows additional time for attempting restoration of the Spray Additive System and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3.

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.7.1

Verifying the correct alignment of Spray Additive System manual and automatic valves in the spray additive flow path provides assurance that the system is able to provide additive to the Containment Spray System in the event of a DBA. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those valves outside containment and capable of potentially being mispositioned are in the correct position.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.7.2

To provide effective iodine removal, the containment spray must be an alkaline solution. Since the RWST contents are normally acidic, the volume of the spray additive tank must provide a sufficient volume of spray additive to adjust pH for all water injected. This SR is performed to verify the availability of sufficient NaOH solution in the Spray Additive System. The 184 day Frequency was developed based on the low probability of an undetected change in tank volume occurring during the SR interval (the tank is isolated during normal unit operations). Tank level is also indicated and alarmed in the control room, so that there is high confidence that a substantial change in level would be detected.

SR 3.6.7.3

This SR provides verification of the NaOH concentration in the spray additive tank and is sufficient to ensure that the spray solution being injected into containment is at the correct pH level. The 184 day Frequency is sufficient to ensure that the concentration level of NaOH in the spray additive tank remains within the established limits. This is based on the low likelihood of an uncontrolled change in concentration (the tank is normally isolated) and the probability that any substantial variance in tank volume will be detected.

SR 3.6.7.4

This SR provides verification that each automatic valve in the Spray Additive System flow path actuates to its correct position. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 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. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.7.5

To ensure that the correct pH level is established in the borated water solution provided by the Containment Spray System, the flow rate in the Spray Additive System is verified once every 5 years. This SR provides assurance that the correct amount of NaOH will be metered into the flow path in each CS train upon Containment Spray System initiation. Due to the passive nature of the spray additive flow controls, the 5 year Frequency is sufficient to identify component degradation that may affect flow rate.

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REFERENCES

1. UFSAR, Section 6.5.2.
2. UFSAR, Chapter 15.

## B 3.6 CONTAINMENT SYSTEMS

### B 3.6.8 Hydrogen Recombiners

#### BASES

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##### BACKGROUND

The function of the hydrogen recombiners is to eliminate the potential breach of containment due to a hydrogen oxygen reaction.

Per 10 CFR 50.44, "Standards for Combustible Gas Control Systems in Light-Water-Cooled Reactors" (Ref. 1), and GDC 41, "Containment Atmosphere Cleanup" (Ref. 2), hydrogen recombiners are required to reduce the hydrogen concentration in the containment following a Loss Of Coolant Accident (LOCA) or Steam Line Break (SLB). The recombiners accomplish this by recombining hydrogen and oxygen to form water vapor. The vapor remains in containment, thus eliminating any discharge to the environment. The hydrogen recombiners are manually initiated since flammable limits would not be reached until several days after a Design Basis Accident (DBA).

Two 100% capacity independent hydrogen recombiner systems are provided and shared between the units. Each consists of controls located in the auxiliary building, a power supply and a recombiner. Recombination is accomplished by heating a hydrogen air mixture to 1325°F. The resulting water vapor and discharge gases are cooled prior to discharge from the recombiner. A single recombiner is capable of maintaining the hydrogen concentration in containment below the 4.1 volume percent (v/o) flammability limit. Two recombiners are provided to meet the requirement for redundancy and independence. Each recombiner is powered from a separate Engineered Safety Features bus, and is provided with a separate power panel and control panel.

The hydrogen recombiners are described in UFSAR, Section 6.2.5 (Ref. 3).

BASES

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APPLICABLE  
SAFETY ANALYSES

The hydrogen recombiners provide for the capability of controlling the bulk hydrogen concentration in containment to less than the lower flammable concentration of 4.1 v/o following a DBA. This control would prevent a containment wide hydrogen burn, thus ensuring the pressure and temperature assumed in the analyses are not exceeded. The limiting DBA relative to hydrogen generation is a LOCA. Hydrogen may accumulate in containment following a LOCA as a result of:

- a. A metal steam reaction between the zirconium fuel rod cladding and the reactor coolant;
- b. Radiolytic decomposition of water in the Reactor Coolant System (RCS) and the containment sump;
- c. Hydrogen in the RCS at the time of the LOCA (i.e., hydrogen dissolved in the reactor coolant and hydrogen gas in the pressurizer vapor space); or
- d. Corrosion of metals exposed to containment spray and Emergency Core Cooling System solutions.

To evaluate the potential for hydrogen accumulation in containment following a LOCA, the hydrogen generation as a function of time following the initiation of the accident is calculated. Conservative assumptions recommended by Reference 4 are used to maximize the amount of hydrogen calculated.

Based on the conservative assumptions used to calculate the hydrogen concentration versus time after a LOCA, the hydrogen concentration in the primary containment would reach 3.5 v/o about 6 days after the LOCA and 4.0 v/o about 2 days later if no recombiner was functioning (Ref. 3). Initiating the hydrogen recombiners when the primary containment hydrogen concentration reaches 3.5 v/o will maintain the hydrogen concentration in the primary containment below flammability limits.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

The hydrogen recombiners are designed such that, with the conservatively calculated hydrogen generation rates discussed above, a single recombiner is capable of limiting the peak hydrogen concentration in containment to less than 4.0 v/o (Ref. 5).

The hydrogen recombiners satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

Two hydrogen recombiners must be OPERABLE. This ensures operation of at least one hydrogen recombiner in the event of a worst case single active failure.

Operation with at least one hydrogen recombiner ensures that the post LOCA hydrogen concentration can be prevented from exceeding the flammability limit.

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APPLICABILITY

In MODES 1 and 2, two hydrogen recombiners are required to control the hydrogen concentration within containment below its flammability limit of 4.0 v/o following a LOCA, assuming a worst case single failure.

In MODES 3 and 4, both the hydrogen production rate and the total hydrogen produced after a LOCA would be less than that calculated for the DBA LOCA. Also, because of the limited time in these MODES, the probability of an accident requiring the hydrogen recombiners is low. Therefore, the hydrogen recombiners are not required in MODE 3 or 4.

In MODES 5 and 6, the probability and consequences of a LOCA are low, due to the pressure and temperature limitations in these MODES. Therefore, hydrogen recombiners are not required in these MODES.



BASES

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ACTIONS

A.1

With one containment hydrogen recombiner inoperable, the inoperable recombiner must be restored to OPERABLE status within 30 days. In this condition, the remaining OPERABLE hydrogen recombiner is adequate to perform the hydrogen control function. However, the overall reliability is reduced because a single failure in the OPERABLE recombiner could result in reduced hydrogen control capability. The 30 day Completion Time is based on the availability of the other hydrogen recombiner, the small probability of a LOCA or SLB occurring (that would generate an amount of hydrogen that exceeds the flammability limit), and the amount of time available after a LOCA or SLB (should one occur) for operator action to prevent hydrogen accumulation from exceeding the flammability limit.

Required Action A.1 has been modified by a Note that states the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one recombiner is inoperable. This allowance is based on the availability of the other hydrogen recombiner, the small probability of a LOCA or SLB occurring (that would generate an amount of hydrogen that exceeds the flammability limit), and the amount of time available after a LOCA or SLB (should one occur) for operator action to prevent hydrogen accumulation from exceeding the flammability limit.

BASES

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ACTIONS (continued)

B.1 and B.2

With two hydrogen recombiners inoperable, the ability to perform the hydrogen control function via alternate capabilities must be verified by administrative means within 1 hour. The alternate hydrogen control capabilities are provided by the natural convection processes, containment fan cooler operation, containment spray, and the Post-LOCA Purge System. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen control function does not exist. In addition, the alternate hydrogen control system capability must be verified once per 12 hours thereafter to ensure its continued availability. Both the initial verification and all subsequent verifications may be performed as an administrative check by examining logs or other information to determine the availability of the alternate hydrogen control system. It does not mean to perform the Surveillances needed to demonstrate OPERABILITY of the alternate hydrogen control system. If the ability to perform the hydrogen control function is maintained, continued operation is permitted with two hydrogen recombiners inoperable for up to 7 days. Seven days is a reasonable time to allow two hydrogen recombiners to be inoperable because the hydrogen control function is maintained and because of the low probability of the occurrence of a LOCA that would generate hydrogen in the amounts capable of exceeding the flammability limit.

C.1

If the inoperable hydrogen recombiner(s) cannot be restored to OPERABLE status within the required Completion Time or the hydrogen control function cannot be maintained, 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 at least MODE 3 within 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.6.8.1

Performance of a system functional test for each hydrogen recombiner ensures the recombiners are operational and can attain and sustain the temperature necessary for hydrogen recombination. In particular, this SR verifies that the minimum heater sheath temperature increases to  $\geq 1200^{\circ}\text{F}$  in  $\leq 90$  minutes. After reaching  $1200^{\circ}\text{F}$ , the power is increased to maximum power for approximately 2 minutes and power is verified to be  $\geq 38$  kW.

Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

SR 3.6.8.2

This SR ensures there are no physical problems that could affect recombiner operation. Since the recombiners are mechanically passive, they are not subject to mechanical failure. The only credible failure involves loss of power, blockage of the internal flow, missile impact, etc.

A visual inspection is sufficient to determine abnormal conditions (e.g., loose wiring or structural connections, deposits of foreign material, etc.) that could cause such failures. The 18 month Frequency for this SR was developed considering the incidence of hydrogen recombiners failing the SR in the past is low.

SR 3.6.8.3

This SR requires performance of a resistance to ground test for each heater phase to ensure that there are no detectable grounds in any heater phase. This is accomplished by verifying that the resistance to ground for any heater phase is  $\geq 10,000$  ohms.

The 18 month Frequency for this Surveillance was developed considering the incidence of hydrogen recombiners failing the SR in the past is low.

BASES

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REFERENCES

1. 10 CFR 50.44.
2. 10 CFR 50, Appendix A, GDC 41.
3. UFSAR, Section 6.2.5.
4. Regulatory Guide 1.7, Revision 2.
5. UFSAR, Chapter 15.

BASES

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## B 3.7 PLANT SYSTEMS

### B 3.7.1 Main Steam Safety Valves (MSSVs)

#### BASES

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##### BACKGROUND

The primary purpose of the MSSVs is to provide overpressure protection for the secondary system. The MSSVs also provide protection against overpressurizing the Reactor Coolant Pressure Boundary (RCPB) by providing a heat sink for the removal of energy from the Reactor Coolant System (RCS) if the preferred heat sink, provided by the Condenser and Circulating Water System, is not available. The MSSVs also serve as Containment Isolation Valves (CIVs); however, the CIV function is addressed in LCO 3.6.3, "Containment Isolation Valves."

Five MSSVs are located on each main steam header, outside containment, upstream of the main steam isolation valves, as described in the UFSAR, Section 10.3.1 (Ref. 1). The MSSV capacity criteria is 110% of rated steam flow at 110% of the steam generator design pressure. This meets the requirements of the ASME Code, Section III (Ref. 2). The MSSV design includes staggered setpoints, according to Table 3.7.1-2 in the accompanying LCO, so that only the needed valves will actuate. Staggered setpoints reduce the potential for valve chattering that is due to steam pressure insufficient to fully open all valves following a turbine reactor trip.

##### APPLICABLE SAFETY ANALYSES

The design basis for the MSSVs comes from Reference 2 and its purpose is to limit the secondary system pressure to  $\leq 110\%$  of design pressure when passing 100% of design steam flow. This design basis is sufficient to cope with any Anticipated Operational Occurrence (AOO) or accident considered in the Design Basis Accident (DBA) and transient analysis. The MSSVs are also credited as CIVs (refer to LCO 3.6.3).

## BASES

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APPLICABLE SAFETY ANALYSES (continued)

The events that challenge the relieving capacity of the MSSVs, and thus RCS pressure, are those characterized as decreased heat removal events, which are presented in the UFSAR, Section 15.2 (Ref. 3). Of these, the full power turbine trip without steam dump is the limiting AOO. This event also terminates normal feedwater flow to the steam generators.

The transient response for turbine trip without a direct reactor trip presents no hazard to the integrity of the RCS or the Main Steam System. If a minimum reactivity feedback is assumed, the reactor is tripped on high pressurizer pressure. In this case, the pressurizer safety valves open, and RCS pressure remains below 110% of the design value. The MSSVs also open to limit the secondary steam pressure.

If maximum reactivity feedback is assumed, the reactor is tripped on overtemperature  $\Delta T$ . The departure from nucleate boiling ratio increases throughout the transient, and never drops below its initial value. Pressurizer relief valves and MSSVs are activated and prevent overpressurization in the primary and secondary systems. The MSSVs are assumed to have two active and one passive failure modes. The active failure modes are spurious opening, and failure to reclose once opened. The passive failure mode is failure to open upon demand.

The MSSVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The accident analysis requires five MSSVs per steam generator to provide overpressure protection for design basis transients occurring at 102% RTP. An MSSV will be considered inoperable if it fails to open on demand. The LCO requires that five MSSVs be OPERABLE in compliance with Reference 2, even though this is not a requirement of the DBA analysis. This is because operation with less than the full number of MSSVs requires limitations on allowable THERMAL POWER (to meet ASME Code requirements). These limitations are according to Table 3.7.1-1 in the accompanying LCO.

The OPERABILITY of the MSSVs is defined as the ability to open within the setpoint tolerances, relieve steam generator overpressure, and reseal when pressure has been reduced. The OPERABILITY of the MSSVs is determined by periodic surveillance testing in accordance with the Inservice Testing Program.

The lift settings, according to Table 3.7.1-2, in the accompanying LCO, correspond to ambient conditions of the valve at nominal operating temperature and pressure.

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.

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### APPLICABILITY

In MODE 1 above 25% RTP, the number of MSSVs per steam generator required to be OPERABLE must be according to Table 3.7.1-1 in the accompanying LCO. Below 25% RTP in MODES 1, 2, and 3, only two MSSVs per steam generator are required to be OPERABLE.

In MODES 4 and 5, there are no credible transients requiring the MSSVs. The steam generators are not normally used for heat removal in MODES 5 and 6, and thus cannot be overpressurized; there is no requirement for the MSSVs to be OPERABLE in these MODES.



BASES

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ACTIONS

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

A.1

With one or more MSSVs inoperable, reduce power so that the available MSSV relieving capacity meets Reference 2 requirements for the applicable THERMAL POWER.

Operation with less than all five MSSVs OPERABLE for each steam generator is permissible, if THERMAL POWER is limited to the relief capacity of the remaining MSSVs. This is accomplished by restricting THERMAL POWER so that the energy transfer to the most limiting steam generator is not greater than the available relief capacity in that steam generator. For example, if one MSSV is inoperable in one steam generator, the relief capacity of that steam generator is reduced by approximately 20%. To offset this reduction in relief capacity, energy transfer to that steam generator must be similarly reduced by at least 20%. This is accomplished by reducing THERMAL POWER by at least 20%, which conservatively limits the energy transfer to all steam generators to approximately 80% of total capacity, consistent with the relief capacity of the most limiting steam generator.

As described in Reference 4, when the Moderator Temperature Coefficient is positive the reactor power may increase above the initial value during a loss of load/turbine trip event. Thus, the power must be reduced in 4 hours (Required Action A.1) to less than or equal to the value specified in Table 3.7.1-1, corresponding to the number of OPERABLE MSSVs.

The allowed Completion Times are reasonable based on operating experience to accomplish the Required Actions in an orderly manner without challenging plant systems.

## BASES

## ACTIONS (continued)

The applicable power limits of Table 3.7.1-1 are derived on the following bases:

$$High \phi = \frac{100}{Q} \left( \frac{w_s h_{fg} N}{K} \right)$$

Where:

- High  $\phi$  = Safety Analysis power range high neutron flux setpoint, in percent.
- Q = Nominal NSSS power rating of the plant (including reactor coolant pump heat), in Mwt (= 3427.6 Mwt).
- K = Conversion factor = 947.82 (BTU/sec)/Mwt.
- $w_s$  = minimum total steam flow rate capability of the OPERABLE MSSVs on any one steam generator at the highest MSSV opening pressure including tolerance and accumulation, as appropriate, in lbm/sec.
- $h_{fg}$  = Heat of vaporization for steam at the highest MSSV opening pressure including tolerance and accumulation, as appropriate, in BTU/lbm.
- N = Number of loops in the plant (= 4).

The values calculated from this algorithm were adjusted lower for use in Table 3.7.1-1 to account for instrument and channel uncertainties (9% power).

## BASES

## ACTIONS (continued)

B.1 and B.2

If the MSSVs cannot be restored to OPERABLE status or THERMAL POWER is not reduced within the associated Completion Time, or if one or more steam generators have less than two MSSVs OPERABLE, 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 within 12 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.

SURVEILLANCE  
REQUIREMENTSSR 3.7.1.1

This SR verifies the OPERABILITY of the MSSVs by the verification of each MSSV lift setpoint in accordance with the Inservice Testing Program. The ASME Code (Ref. 5) specifies the activities and frequencies necessary to satisfy the requirements. Table 3.7.1-2 allows a  $\pm 3\%$  setpoint tolerance for OPERABILITY; however, the valves are reset to  $\pm 1\%$  during the Surveillance to allow for drift.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSSVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSSVs are not tested at hot conditions, the lift setting pressure shall be corrected to ambient conditions of the valve at operating temperature and pressure.

BASES

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REFERENCES

1. UFSAR, Section 10.3.1.
2. ASME, Boiler and Pressure Vessel Code, Section III, Article NC-7000, Class 2 Components.
3. UFSAR, Section 15.2.
4. NRC Information Notice 94-60, "Potential Overpressurization of the Main Steam System," August 22, 1994.
5. ASME, Boiler and Pressure Vessel Code, Section XI.

BASES

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## B 3.7 PLANT SYSTEMS

### B 3.7.2 Main Steam Isolation Valves (MSIVs)

#### BASES

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#### BACKGROUND

The MSIVs isolate steam flow from the secondary side of the steam generators following a High Energy Line Break (HELB). MSIV closure terminates flow from the unaffected (intact) steam generators.

One MSIV is located in each main steam line outside, but close to containment. The MSIVs are downstream from the Main Steam Safety Valves (MSSVs), to prevent MSSV isolation from the steam generators by MSIV closure. Closing the MSIVs isolates each steam generator from the others, and isolates the turbine, Steam Dump System, and other auxiliary steam supplies from the steam generators.

The MSIVs close on a main steam isolation signal generated by Steam Line Low Pressure, Steam Line High Negative Rate, or High-2 containment pressure. The MSIVs fail as is on loss of control or actuation power.

Each MSIV has an MSIV bypass valve. Although these bypass valves are normally closed, they receive the same automatic closure signal as do their associated MSIVs. The MSIVs may also be actuated manually.

A description of the MSIVs is found in the UFSAR, Section 10.3 (Ref. 1).

BASES

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APPLICABLE  
SAFETY ANALYSES

The design basis of the MSIVs is established by the analysis for the large Steam Line Break (SLB) outside containment, discussed in the UFSAR, Section 15.1.5 (Ref. 2). It is also affected by the accident analysis of the SLB events presented in the UFSAR, Section 6.2 (Ref. 3). The design precludes the blowdown of more than one steam generator, assuming a single active component failure (e.g., the failure of one MSIV to close on demand).

The accident analysis compares several different SLB events against different acceptance criteria. The large SLB outside containment upstream of the MSIV is limiting for offsite dose, although a break in this short section of main steam header has a very low probability. The large SLB inside containment at hot zero power is the limiting case for a post trip return to power. The analysis includes scenarios with offsite power available, and with a loss of offsite power following turbine trip. With offsite power available, the reactor coolant pumps continue to circulate coolant through the steam generators, maximizing the Reactor Coolant System (RCS) cooldown. With a loss of offsite power, the response of mitigating systems is delayed. Significant single failures considered include failure of an MSIV to close.

The MSIVs serve only a safety function and remain open during power operation. These valves operate under the following situations:

- a. An HELB inside containment. In order to maximize the mass and energy release into containment, the analysis assumes that the MSIV in the affected steam generator remains open. For this accident scenario, steam is discharged into containment from all steam generators until the remaining MSIVs close. After MSIV closure, steam is discharged into containment only from the affected steam generator and from the residual steam in the main steam header downstream of the closed MSIVs in the unaffected loops. Closure of the MSIVs isolates the break from the unaffected steam generators.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

- b. A break outside of containment and upstream from the MSIVs is not a containment pressurization concern. The uncontrolled blowdown of more than one steam generator must be prevented to limit the potential for uncontrolled RCS cooldown and positive reactivity addition. Closure of the MSIVs isolates the break and limits the blowdown to a single steam generator.
- c. A break downstream of the MSIVs will be isolated by the closure of the MSIVs.
- d. Following a steam generator tube rupture, closure of the MSIVs isolates the ruptured steam generator from the intact steam generators to minimize radiological releases.
- e. The MSIVs are also utilized during other events such as a feedwater line break. This event is less limiting so far as MSIV OPERABILITY is concerned.

The MSIVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

This LCO requires that four MSIVs in the steam lines be OPERABLE. The MSIVs are considered OPERABLE when the isolation times are within limits, and they close on an isolation actuation signal.

This LCO provides assurance that the MSIVs will perform their design safety function to mitigate the consequences of accidents that could result in offsite exposures comparable to the 10 CFR 100 (Ref. 4) limits or the NRC staff approved licensing basis.



## BASES

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**APPLICABILITY** The MSIVs must be OPERABLE in MODE 1, and in MODES 2 and 3 except when closed, when there is significant mass and energy in the RCS and steam generators. When the MSIVs are closed, they are already performing the safety function. In MODE 4 the steam generator energy is low.

In MODE 5 or 6, the steam generators do not contain much energy because their temperature is below the boiling point of water; therefore, the MSIVs are not required for isolation of potential high energy secondary system pipe breaks in these MODES.

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## ACTIONS

### A.1

With one MSIV inoperable in MODE 1, action must be taken to restore OPERABLE status within 8 hours. Some repairs to the MSIV can be made with the unit hot. The 8 hour Completion Time is reasonable, considering the low probability of an accident occurring during this time period that would require a closure of the MSIVs.

The 8 hour Completion Time is greater than that normally allowed for containment isolation valves because the MSIVs are valves that isolate a closed system penetrating containment. These valves differ from other containment isolation valves in that the closed system provides an additional means for containment isolation.

### B.1

If the MSIV cannot be restored to OPERABLE status within 8 hours, 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 MODE 2 within 6 hours and Condition C would be entered. The Completion Time is reasonable, based on operating experience, to reach MODE 2 and to close the MSIVs in an orderly manner and without challenging plant systems.

## BASES

### ACTIONS (continued)

#### 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.

The 8 hour Completion Time is consistent with that allowed in Condition A.

For inoperable MSIVs that cannot be restored to OPERABLE status within the specified Completion Time, but 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 MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTSSR 3.7.2.1

This SR verifies that MSIV closure time is  $\leq 5$  seconds. The MSIV closure time is assumed in the accident and containment analyses. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. Based on ASME Code Section XI (Ref. 5), the MSIVs are not closure time tested at power.

The Frequency is in accordance with the Inservice Testing Program. This test is conducted in MODE 3 with the unit at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

SR 3.7.2.2

This SR verifies that each MSIV can close on an actual or simulated actuation signal. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. The frequency of MSIV testing is every 18 months. The 18 month Frequency for testing is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, this Frequency is acceptable from a reliability standpoint.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

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REFERENCES

1. UFSAR, Section 10.3.
2. UFSAR, Section 15.1.5.
3. UFSAR, Section 6.2.
4. 10 CFR 100.11.
5. ASME, Boiler and Pressure Vessel Code, Section XI.

## B 3.7 PLANT SYSTEMS

### B 3.7.3 Secondary Specific Activity

#### BASES

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#### BACKGROUND

Activity in the secondary coolant results from steam generator tube outleakage from the Reactor Coolant System (RCS). Under steady state conditions, the activity is primarily iodines with relatively short half lives and, thus, indicates current conditions. During transients, I-131 spikes have been observed as well as increased releases of some noble gases. Other fission product isotopes, as well as activated corrosion products in lesser amounts, may also be found in the secondary coolant.

A limit on secondary coolant specific activity during power operation minimizes releases to the environment because of normal operation, anticipated operational occurrences, and accidents.

This limit is lower than the activity value that might be expected from a 1 gpm tube leak (LCO 3.4.13, "RCS Operational LEAKAGE") of primary coolant at the limit of  $1.0 \mu\text{Ci/gm}$  (LCO 3.4.16, "RCS Specific Activity"). The steam line failure is assumed to result in the release of the noble gas and iodine activity contained in the steam generator inventory, the feedwater, and the reactor coolant LEAKAGE. Most of the iodine isotopes have short half lives, (i.e., < 20 hours). I-131, with a half life of 8.04 days, concentrates faster than it decays, but does not reach equilibrium because of blowdown and other losses.

With the specified activity limit, the resultant 2 hour thyroid dose to a person at the exclusion area boundary (EAB) would be about 0.58 Rem if the Main Steam Safety Valves (MSSVs) open for 2 hours following a trip from full power.

Operating a unit at the allowable limits could result in a 2 hour EAB exposure of a small fraction of the 10 CFR 100 (Ref. 1) limits.

BASES

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APPLICABLE  
SAFETY ANALYSES

The accident analysis of the Main Steam Line Break (MSLB), as discussed in the UFSAR, Chapter 15 (Ref. 2) assumes the initial secondary coolant specific activity to have a radioactive isotope concentration of 0.1  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131. This assumption is used in the analysis for determining the radiological consequences of the postulated accident. The accident analysis, based on this and other assumptions, shows that the radiological consequences of an MSLB do not exceed a small fraction of the unit EAB limits (Ref. 1) for whole body and thyroid dose rates.

With the loss of offsite power, the remaining steam generators are available for core decay heat dissipation by venting steam to the atmosphere through the MSSVs and Steam Generator (SG) Power Operated Relief Valves (PORVs). The Auxiliary Feedwater System supplies the necessary makeup to the steam generators. Venting continues until the reactor coolant temperature and pressure have decreased sufficiently for the Residual Heat Removal System to complete the cooldown.

In the evaluation of the radiological consequences of this accident, the activity released from the steam generator connected to the failed steam line is assumed to be released directly to the environment. The unaffected steam generators are assumed to discharge steam and any entrained activity through the MSSVs and SG PORVs during the event. Since no credit is taken in the analysis for activity plate out or retention, the resultant radiological consequences represent a conservative estimate of the potential integrated dose due to the postulated steam line failure.

Secondary specific activity limits satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

As indicated in the Applicable Safety Analyses, the specific activity of the secondary coolant is required to be  $\leq 0.1 \mu\text{Ci/gm}$  DOSE EQUIVALENT I-131 to limit the radiological consequences of a Design Basis Accident (DBA) to a small fraction of the required limit (Ref. 1).

Monitoring the specific activity of the secondary coolant ensures that when secondary specific activity limits are exceeded, appropriate actions are taken in a timely manner to place the unit in an operational MODE that would minimize the radiological consequences of a DBA.

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### APPLICABILITY

In MODES 1, 2, 3, and 4, the limits on secondary specific activity apply due to the potential for secondary steam releases to the atmosphere.

In MODES 5 and 6, the steam generators are not being used for heat removal. Both the RCS and steam generators are depressurized, and primary to secondary LEAKAGE is minimal. Therefore, monitoring of secondary specific activity is not required.

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### ACTIONS

#### A.1 and A.2

DOSE EQUIVALENT I-131 exceeding the allowable value in the secondary coolant, is an indication of a problem in the RCS and contributes to increased post accident doses. If the secondary specific activity is not within limits, 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 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 plant systems.

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BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.3.1

This SR verifies that the secondary specific activity is within the limits of the accident analysis. A gamma isotopic analysis of the secondary coolant, which determines DOSE EQUIVALENT I-131, confirms the validity of the safety analysis assumptions as to the source terms in post accident releases. It also serves to identify and trend any unusual isotopic concentrations that might indicate changes in reactor coolant activity or LEAKAGE. The 31 day Frequency is based on the detection of increasing trends of the level of DOSE EQUIVALENT I-131, and allows for appropriate action to be taken to maintain levels below the LCO limit.

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REFERENCES

1. 10 CFR 100.11.
2. UFSAR, Chapter 15.

## B 3.7 PLANT SYSTEMS

### B 3.7.4 Steam Generator (SG) Power Operated Relief Valves (PORVs)

#### BASES

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##### BACKGROUND

The SG PORVs provide a method for cooling the unit to Residual Heat Removal (RHR) entry conditions should the preferred heat sink via the Steam Dump System to the condenser not be available, as discussed in the UFSAR, Section 10.3 (Ref. 1). This is done in conjunction with the Auxiliary Feedwater System providing cooling water from the condensate storage tank (CST). The SG PORVs may also be required to meet the design cooldown rate during a normal cooldown when steam pressure drops too low for maintenance of a vacuum in the condenser to permit use of the Steam Dump System. The SG PORVs also serve as Containment Isolation Valves (CIVs); however, the CIV function is addressed in LCO 3.6.3, "Containment Isolation Valves."

One SG PORV line for each of the four steam generators is provided. Each SG PORV line consists of one SG PORV and an associated block valve.

The SG PORVs are provided with upstream block valves to permit their being tested at power, and to provide an alternate means of isolation. The SG PORVs are equipped with electrohydraulic actuators to permit control of the cooldown rate.

A description of the SG PORVs is found in Reference 1. The SG PORVs are powered from Class 1E buses. In addition, handpumps are provided for local manual operation.



BASES

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APPLICABLE  
SAFETY ANALYSES

The SG PORV lines provide an alternate method for cooling the unit to RHR entry condition whenever the preferred heat sink via the Steam Dump System to the condenser is unavailable. The limiting design basis for the SG PORVs is established by the Steam Generator Tube Rupture (SGTR) event described in UFSAR Section 15.6.3 (Ref. 2). The SGTR event is analyzed to determine that the offsite radiological doses remain less than the guideline values. The SGTR event assumes a coincident loss of offsite power, which is conservative with respect to the offsite radiological doses, and a most limiting single failure. The loss of offsite power assumption results in the SG PORVs being relied on to reduce Reactor Coolant System (RCS) temperature to recover from an SGTR and also to reduce RCS temperature and pressure to RHR entry conditions. The most limiting single failure with respect to offsite radiological doses is a failed open SG PORV on the ruptured SG. This failure results in an uncontrolled depressurization of the ruptured SG until the local block valve for that SG PORV is closed. This failure maximizes the activity release from the ruptured SG to the atmosphere.

In addition, the SGTR analysis considers SG overfill. SG overfill during an SGTR event is a concern due to the potential liquid release via Steam Dump System, SG PORVs, or Main Steam Safety Valves (MSSVs) to the atmosphere that must be assumed and the resulting increase in the offsite radiological dose. The limiting single failure with respect to SG overfill is the failure of one SG PORV on an intact SG to open when required for cooldown of the RCS. The analysis assumes four SG PORVs are OPERABLE at the start of the SGTR event. One SG PORV is on the ruptured SG, another SG PORV is assumed to fail to open and the remaining SG PORVs are used to perform the RCS cooldown. The analysis shows that cooldown using two SG PORVs results in no SG overfill.

# BASES

## APPLICABLE SAFETY ANALYSES (continued)

The recovery from the SGTR requires a rapid cooldown to establish adequate subcooling as a necessary step to allow depressurization of the RCS to terminate the primary to secondary break flow in the ruptured steam generator. The time required to terminate the primary to secondary break flow in the SGTR event, is more critical than the time required to cool the RCS down to RHR conditions for this event and other accident analyses. After primary to secondary break flow termination, it is assumed that SG PORVs on two intact SGs are used to cool the RCS down to 350°F.

The resulting offsite radiological doses are as specified by Standard Review Plan 15.6.3 (Ref. 3) and well within the allowable guidelines of 10 CFR 100 (Ref. 4).

The SG PORVs are equipped with manual block valves in the event a SG PORV fails to close during use. The SG PORVs are also credited as CIVs (refer to LCO 3.6.3).

The SG PORVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## LCO

Four SG PORV lines are required to be OPERABLE. One SG PORV line is required from each of four steam generators to ensure that at least two SG PORV lines are available to conduct a unit cooldown following an SGTR, in which one steam generator becomes unavailable, accompanied by a single, active failure of a second SG PORV line on an unaffected steam generator. The block valves must be OPERABLE to isolate a failed open SG PORV line. A closed block valve does not render it or its SG PORV line inoperable. Operator action time to open the block valve is supported in the accident analysis.

Failure to meet the LCO can result in the inability to cool the unit to RHR entry conditions following an SGTR event in which the condenser is unavailable for use with the Steam Dump System.

BASES

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LCO (continued)

A SG PORV is considered OPERABLE when it is capable of providing controlled relief of the main steam flow and capable of fully opening and closing on demand.

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APPLICABILITY

In MODES 1, 2, and 3, the SG PORVs are required to be OPERABLE.

In MODE 4, the pressure and temperature limitations are such that the probability of an SGTR event requiring SG PORV operation is low. In addition, the RHR system is available to provide the decay heat removal function in MODE 4. Therefore, the SG PORV lines are not required OPERABLE in MODE 4.

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

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ACTIONS

A.1

With one SG PORV line inoperable, action must be taken to restore OPERABLE status within 30 days. The 30 day Completion Time allows for the redundant capability afforded by the remaining OPERABLE SG PORV lines, a nonsafety grade backup in the Steam Dump 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 PORV lines inoperable, action must be taken to restore all but one SG PORV line to OPERABLE status. Since the block valve can be closed to isolate a SG PORV, some repairs may be possible with the unit at power. The 24 hour Completion Time is reasonable to repair inoperable SG PORV lines, based on the availability of the Steam Dump System and MSSVs, and the low probability of an event occurring during this period that would require the SG PORV lines.

BASES

ACTIONS (continued)

C.1 and C.2

If the SG PORV lines 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 within 12 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 plant systems.

SURVEILLANCE  
REQUIREMENTS

SR 3.7.4.1

To perform a controlled cooldown of the RCS, the SG PORVs must be able to be opened either remotely or locally and throttled through their full range. This SR ensures that the SG PORVs are tested through a full control cycle at least once per fuel cycle. Performance of inservice testing or use of a SG PORV during a 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.

SR 3.7.4.2

The function of the block valve is to isolate a failed open SG PORV. 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.

BASES

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REFERENCES

1. UFSAR, Section 10.3.
2. UFSAR, Section 15.6.3.
3. Standard Review Plan 15.6.3.
4. 10 CFR 100.

## B 3.7 PLANT SYSTEMS

### B 3.7.5 Auxiliary Feedwater (AF) System

#### BASES

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#### BACKGROUND

The AF System automatically supplies feedwater to the Steam Generators (SGs) to remove decay heat from the Reactor Coolant System upon the loss of normal feedwater supply. The AF pumps normally take suction from the condensate storage tank (CST) (LCO 3.7.6) and pump to the steam generator secondary side via separate and independent connections to the feedwater piping outside containment. If the CST is not available, AF can be supplied by the Essential Service Water System. The steam generators function as a heat sink for core decay heat. The heat load is dissipated by releasing steam to the atmosphere from the steam generators via the Main Steam Safety Valves (MSSVs) (LCO 3.7.1) or SG Power Operated Relief Valves (PORVs) (LCO 3.7.4). If the main condenser is available, steam may be released via the steam dump valves and recirculated to the CST.

The AF System consists of a motor driven AF pump and a diesel driven pump configured into two trains. Each pump provides 100% of the required AF capacity to the steam generators, as assumed in the accident analysis. The pumps are equipped with independent recirculation lines to prevent pump operation against a closed system. The motor driven AF pump is powered from an independent Class 1E power supply and feeds four steam generators. The diesel driven AF pump is powered from an independent diesel and also feeds four steam generators. The diesel driven AF pump is supported by a diesel engine, an independent battery system, an essential service water booster pump, and a fuel oil day tank. Thus, the requirement for diversity in motive power sources for the AF System is met.

The AF System is capable of supplying, but does not normally supply, feedwater to the steam generators during normal unit startup, shutdown, and hot standby conditions.

One pump at full flow is sufficient to remove decay heat and cool the unit to Residual Heat Removal (RHR) entry conditions.

## BASES

### BACKGROUND (continued)

The AF System is designed to supply sufficient water to the steam generator(s) to remove decay heat with steam generator pressure at the setpoint of the MSSVs. Subsequently, the AF System supplies sufficient water to cool the unit to RHR entry conditions, with steam released through the SG PORVs.

The AF System actuates automatically on low-2 steam generator water level, Safety Injection and Undervoltage (UV) on the Reactor Coolant Pump buses. The motor driven AF pump also actuates on an UV on bus 141(241).

The AF System is discussed in the UFSAR, Section 10.4.9 (Ref. 1).

### APPLICABLE SAFETY ANALYSES

The AF System mitigates the consequences of any event with loss of normal feedwater.

The design basis of the AF System is to supply water to the steam generator to remove decay heat and other residual heat by delivering at least the minimum required flow rate to the steam generators at pressures corresponding to the maximum steam pressure inside an intact steam generator during the long term cooling portion of the design basis accident (i.e., after steam line isolation occurs). This maximum steam pressure is 1250 psia (Ref. 2).

In addition, the AF System must supply enough makeup water to replace steam generator secondary inventory lost as the unit cools to MODE 4 conditions. Sufficient AF flow must also be available to account for flow losses such as pump recirculation and line breaks.

The limiting Design Basis Accidents (DBAs) and transients for the AF System are as follows:

- a. Feedwater Line Break (FWLB); and
- b. Loss of normal feedwater.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

In addition, the minimum available AF flow and system characteristics are serious considerations in the analysis of a small break Loss Of Coolant Accident (LOCA) and loss of offsite power (Ref. 3).

The AF System design is such that it can perform its function following an FWLB between the main feedwater isolation valves and containment, combined with a loss of offsite power following turbine trip, and a single active failure of one AF pump. The AF lines to the SGs are orificed such that at least 420 gpm is delivered to the non faulted SGs. Reactor trip is assumed to occur when the faulted SG reaches the low-low level setpoint. Sufficient flow would be delivered to the intact steam generators by the other AF pump.

During the loss of all AC power events, the Engineered Safety Feature Actuation System (ESFAS) automatically actuates the AF diesel driven pump and associated controls to ensure an adequate supply to the steam generators during loss of power. Valves which can be manually controlled are provided for each AF line to control the AF flow to each steam generator during loss of all AC power events.

The AF System satisfies the requirements of Criterion 3 of 10 CFR 50.36(c)(2)(ii).



## BASES

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### LCO

This LCO provides assurance that the AF System will perform its design safety function to mitigate the consequences of accidents that could result in overpressurization of the reactor coolant pressure boundary. Two independent AF pumps in two diverse trains are required to be OPERABLE to ensure the availability of RHR capability for all events accompanied by a loss of offsite power and a single failure. This is accomplished by powering one of the pumps from the emergency buses. The second AF pump is powered by a different means, a diesel engine.

The AF System is configured into two trains. The AF System is considered OPERABLE when the components and flow paths required to provide redundant AF flow to the steam generators are OPERABLE. This requires that the motor driven AF pump and the diesel driven AF pump be OPERABLE and capable of supplying AF to each steam generator. The associated piping, valves, instrumentation, and controls in the required flow paths to perform the safety related function are also required to be OPERABLE.

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### APPLICABILITY

In MODES 1, 2, and 3, the AF System is required to be OPERABLE in the event that it is called upon to function when feedwater is lost.

In MODE 4, 5, or 6, the steam generators are not normally used for heat removal, and the AF System is not required.

BASES

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ACTIONS

A.1

With one of the required AF trains (pump or flow path) inoperable, action must be taken to restore OPERABLE status within 72 hours. The 72 hour Completion Time is reasonable, based on redundant capabilities afforded by the AF System, time needed for repairs, and the low probability of a DBA occurring during this time period.

B.1 and B.2

When Required Action A.1 cannot be completed within the required 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 within 12 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 plant systems.

C.1

If both AF trains are inoperable, the unit is in a seriously degraded condition with no safety related means for conducting a cooldown, and only limited means for conducting a cooldown with nonsafety related equipment. In such a condition, the unit should not be perturbed by any action, including a power change, that might result in a trip. The seriousness of this condition requires that action be started immediately to restore one AF train to OPERABLE status.

Required Action C.1 is modified by a Note indicating that all required MODE changes or power reductions are suspended until one AF train is restored to OPERABLE status. In this case, LCO 3.0.3 is not applicable because it could force the unit into a less safe condition. In addition, the Completion Times of Required Actions which are suspended are also suspended.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.5.1

Verifying the correct alignment for manual, power operated, and automatic valves in the AF System provides assurance that the proper flow paths will exist for AF 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 locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

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

SR 3.7.5.2

This SR provides verification that the level of fuel oil in the day tank is at or above the level at which fuel oil is added. The level is expressed as an equivalent volume in gallons.

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

## BASES

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SURVEILLANCE REQUIREMENTS (continued)SR 3.7.5.3

Verifying that each AF pump's developed head at the flow test point is greater than or equal to the required developed head ensures that AF pump performance has not degraded during the cycle. Flow and differential head are normal tests of centrifugal pump performance required by Section XI of the ASME Code (Ref. 4). Because it is undesirable to introduce cold AF into the steam generators while they are operating, this testing is performed on recirculation flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance. Performance of inservice testing discussed in the ASME Code, Section XI (Ref. 4) (only required at 3 month intervals) satisfies this requirement.

SR 3.7.5.4

This SR verifies that AF can be delivered to the steam generators in the event of any accident or transient that generates an ESFAS, by demonstrating that each automatic valve in the flow path actuates to its correct position on an actual or simulated actuation signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The 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. The 18 month Frequency is acceptable based on operating experience and the design reliability of the equipment.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.5.5

This SR verifies that the AF pumps will start in the event of any accident or transient that generates an ESFAS by demonstrating that each AF pump starts automatically on an actual or simulated actuation signal. The 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.

SR 3.7.5.6

This SR verifies that the AF 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 any combination of MODE 5, MODE 6, or defueled. OPERABILITY of AF flow paths must be verified before sufficient core heat is generated that would require the operation of the AF System during a subsequent shutdown. The Frequency is reasonable, based on engineering judgement and other administrative controls that ensure that flow paths remain OPERABLE. To ensure AF System alignment, flow path OPERABILITY is verified following extended outages to determine no misalignment of valves has occurred. This SR ensures that the flow path from the CST to the steam generators is properly aligned.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.5.7

The tests of fuel oil are a means of assuring it has not been contaminated with substances that would have an immediate, detrimental impact on diesel engine combustion. The tests, limits, and applicable ASTM standards are listed in the Diesel Fuel Oil Testing Program, as described in Specification 5.5.13.

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 (Ref. 5). This method involves a 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.

Fuel Oil to the Auxiliary Feedwater Pump Day Tank is supplied from the outside fuel oil storage tanks. These tanks are also subject to the requirements of the Diesel Fuel Oil Testing Program, as described in Specification 5.5.13.

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.

BASES

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REFERENCES

1. UFSAR, Section 10.4.9.
2. Westinghouse Nuclear Safety Evaluation Checklist, SECL 90-469, Revision 1, "Byron/Braidwood Units 1 and 2, Relaxation of MSSV Setpoint Tolerance to +/- 3% - Revised SECL."
3. UFSAR, Section 15.2.
4. ASME, Boiler and Pressure Vessel Code, Section XI.
5. ASTM Standards, D2276.

## B 3.7 PLANT SYSTEMS

## B 3.7.6 Condensate Storage Tank (CST)

BASES

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## BACKGROUND

The CST provides a nonsafety grade source of water to the steam generators for removing decay and sensible heat from the Reactor Coolant System (RCS). The CST provides a passive flow of water, by gravity, to the Auxiliary Feedwater (AF) System (LCO 3.7.5) which feeds the steam generators. The steam produced is released to the atmosphere by the Main Steam Safety Valves (MSSVs) or the steam generator power operated relief valves when the condenser is not available. The AF pumps normally operate with recirculation to the CST.

When the main steam isolation valves or their associated bypass 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 valves. The condensed steam is returned to the CST via the condenser overflow line into the condensate makeup header using the condensate booster pumps. This has the advantage of conserving condensate while minimizing releases to the environment.

The Essential Service Water System provides a safety related backup to the CST. The Essential Service Water System is automatically aligned to provide AF based on system conditions and pump start signals.

A description of the CST is found in the UFSAR, Section 9.2.6 (Ref. 1).



BASES

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APPLICABLE  
SAFETY ANALYSIS

The CST provides cooling water to remove decay heat and to cool down the unit following all events in the accident analysis as discussed in the UFSAR, Chapters 6 and 15 (Refs. 2 and 3, respectively). For anticipated operational occurrences and accidents that do not affect the OPERABILITY of the steam generators, the analysis assumption is generally 30 minutes at MODE 3, steaming through the MSSVs, followed by a cooldown to Residual Heat Removal (RHR) entry conditions at the design cooldown rate.

The limiting event for the condensate volume is the large feedwater line break coincident with a loss of offsite power.

A nonlimiting event considered in CST inventory determinations is a break in either the main feedwater or AF line near where the two join. This break has the potential for dumping condensate until terminated by operator action. This loss of condensate inventory is partially compensated for by the retention of steam generator inventory.

The CST satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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## 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 AF pumps during cooldown, as well as account for any losses before isolating AF to a broken line.

The specified level corresponds to approximately 200,000 gallons which is sufficient to maintain the RCS in MODE 3 at normal operating pressure and temperature for 2 hours, followed by a cooldown to RHR entry conditions at 50°F/hour.

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

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BASES

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APPLICABILITY      In MODES 1, 2, and 3, the CST is required to be OPERABLE.

In MODE 4, 5, or 6, the CST is not required because the AF System is not required.

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## ACTIONS

A.1 and A.2

If the CST level is not within limits, the OPERABILITY of the backup water supply should be verified by administrative means within 4 hours and once every 12 hours thereafter. OPERABILITY of the backup water supply must include verification that the flow paths from the backup water supply to the AF pumps are OPERABLE, and that the backup supply has the required volume of water available. The normal backup supply is the Essential Service Water System. The CST must be restored to OPERABLE status within 7 days, because the backup supply may be performing this function in addition to its normal functions. The 4 hour Completion Time is reasonable, based on operating experience, to verify the OPERABILITY of the backup water supply. The 7 day Completion Time is reasonable, based on an OPERABLE backup water supply being available, and the low probability of an event occurring during this time period requiring the CST.

B.1 and B.2

If the CST cannot be restored to OPERABLE status within the associated Completion Time or the backup water supply is not available, 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 within 12 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 plant systems.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.6.1

This SR verifies that the CST contains the required volume of cooling water. 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.

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REFERENCES

1. UFSAR, Section 9.2.6.
2. UFSAR, Chapter 6.
3. UFSAR, Chapter 15.

## B 3.7 PLANT SYSTEMS

### B 3.7.7 Component Cooling Water (CC) System

#### BASES

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#### BACKGROUND

The CC System is a shared system which provides a heat sink for the removal of process and operating heat from safety related components during a Design Basis Accident (DBA) or transient. During normal operation, the CC System also provides this function for various nonessential components, as well as the spent fuel pool. The CC System serves as a barrier to the release of radioactive byproducts between potentially radioactive systems and the Essential Service Water (SX) System, and thus to the environment.

The shared CC system consists of five pumps (four unit-specific and one common), three heat exchangers (two unit-specific and one common), and two unit-specific surge tanks. The heat exchangers are cooled by SX. The surge tanks are provided to accommodate expansion and contraction due to temperature changes or inleakage, as well as makeup capability. Each surge tank is partitioned by a baffle which protects against complete draining of the tank in case a leak develops in one train during post accident alignments. The surge tank design and associated piping provide surge tank functioning separately to each flow path.

The two unit-specific CC pumps per unit are supplied, one from each 4.16 kV ESF bus. The power supply for the common CC pump can be from any one of the four 4.16 kV ESF buses (141, 142, 241, or 242). For maintaining complete separation, a separate 4.16 kV bus (CC Pump bus), located on the 383 foot elevation of the auxiliary building, is provided. This bus consists of four separate 4.16 kV switchgear cubicles, each connected and interlocked to one of the four ESF divisions. Only one breaker is provided and is racked into the cubicle from which the common CC pump is supplied.

## BASES

## BACKGROUND (continued)

The system is normally aligned with one unit served by two heat exchangers (one unit-specific and the common) and the other unit served by its unit-specific heat exchanger. Normally, the unit with two heat exchangers supplies cooling to both units' "A" train Residual Heat Removal (RHR) heat exchanger and pump. During operation in MODES 1, 2, 3, and 4, one pump and flow path (which includes at least one CC heat exchanger) per unit are capable of serving all operating components. In the event of a Loss Of Coolant Accident (LOCA) on one unit, one pump and flow path are capable of fulfilling system requirements for that unit. The second required pump and flow path provide the required redundancy in the event of a single active or passive failure. Since the CC System is shared between the units, one heat exchanger may be credited to both units.

Piping and manual isolation valves provide the ability for the CC system to operate crosstied between the units or split into separate unit operation, as well as the capability to operate the units on a train basis depending on plant conditions. When operated on a train basis both unit's "A" RHR trains are fed from the common heat exchanger.

Each pump automatically starts on receipt of a safety injection signal or an undervoltage on the associated ESF bus.

Additional information on the design and operation of the system, along with a list of the components served, is presented in the UFSAR, Section 9.2.2 (Ref. 1). The principal safety related function of the CC System is the removal of decay heat from the reactor via the RHR System. This may be during a normal or post accident cooldown and shutdown.

## BASES

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### APPLICABLE SAFETY ANALYSES

The design basis of the CC System is for one CC train (one pump and flow path) to remove the post loss of coolant accident (LOCA) heat load from the containment sump during the recirculation phase. The design prevents the containment sump fluid from increasing in temperature during the recirculation phase following a LOCA, and provides a gradual reduction in the temperature of this fluid as it is supplied to the Reactor Coolant System (RCS) by the Emergency Core Cooling System (ECCS) pumps.

The CC System is designed to perform its function with a single active or passive failure, assuming a loss of offsite power. The analysis considers the potential need to manually realign the system depending on the failure.

The CC System also functions to cool the unit from RHR entry conditions to MODE 5 during normal and post accident operations. The time required is a function of the number of CC and RHR trains operating. One CC train is sufficient to remove decay heat during subsequent operation. The temperature of the cooling water supplied to the various components should be  $\leq 105^{\circ}\text{F}$  during normal operation. During initial operation of the RHR system, the temperature may be permitted to increase to  $120^{\circ}\text{F}$  for a maximum of 3 hours.

The CC System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

In the event of a DBA, one CC pump, CC heat exchanger and flow path are required to provide the minimum heat removal capability assumed in the safety analysis for the systems to which it supplies cooling water on the affected unit. To ensure this requirement is met, two pumps (from separate unit-specific ESF buses) and two flow paths (each with one CC heat exchanger and surge tank availability) must be OPERABLE, assuming the worst case single failure.

The CC System is normally operated as a shared system that provides cooling to equipment in both units. As such, some component can satisfy requirements on both units. Since the CC System is shared, the common heat exchanger and associated portions of its flow path, may be credited to both units.

Therefore, the CC System is considered OPERABLE when:

- a. Two electrically independent pumps are OPERABLE;
- b. Two flow paths, each consisting of a CC heat exchanger, surge tank availability, piping and valves required to supply separate RHR trains, are OPERABLE; and
- c. The associated instrumentation and controls required to perform the safety related function are OPERABLE.

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### APPLICABILITY

In MODES 1, 2, 3, and 4, the CC System is a normally operating system, which must be prepared to perform its post accident safety functions, primarily RCS heat removal, which is achieved by cooling the RHR heat exchanger.

In MODE 5 or 6, the OPERABILITY requirements of the CC System are determined by the systems it supports.

## BASES

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### ACTIONS

The actions are modified by a Note indicating that the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," be entered if an inoperable CC train results in an inoperable RHR loop. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components.

#### A.1

If a CC flow path is not OPERABLE, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE flow path is adequate to perform the heat removal function. The inoperability of the common CC heat exchanger impacts both units' flow paths. Inoperability of a unit-specific CC heat exchanger impacts only the unit-specific flow path.

The 7 day Completion Time is reasonable, based on the redundant capabilities afforded by the OPERABLE train, the ability to crosstie trains and units, and the low probability of a DBA occurring during this period.

#### B.1

If one required CC pump is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE CC pump is adequate to perform the heat removal function. The 7 day Completion Time is reasonable, based on the redundant capabilities afforded by the OPERABLE train, the ability to crosstie the trains and Units, and the low probability of a DBA occurring during this period.

#### C.1 and C.2

If the CC flow path or pump 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 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 plant systems.



BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.7.1

Verifying the correct alignment for manual and power operated valves in the CC flow path provides assurance that the proper flow paths exist for CC operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

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

This SR is modified by a Note indicating isolation of the CC flow to individual components does not affect the OPERABILITY of the CC System. Isolation may render those components inoperable.

SR 3.7.7.2

This SR verifies the correct alignment for manual and power operated SX valves directly serving the CC heat exchangers that are not locked, sealed, or otherwise in the correct position, are in the correct position or can be aligned to the correct position. This includes the ability to align the SX system as required to support unit-specific or opposite unit operations. It also includes assuring that the requirements of the ISI and IST programs are satisfied. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

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

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.7.3

This SR verifies proper automatic operation of the CC pumps on an actual or simulated actuation signal. The CC System is a normally operating system that cannot be fully actuated as part of routine testing during normal operation. The 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. 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.

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REFERENCES

1. UFSAR, Section 9.2.2.

1  
BASES

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## B 3.7 PLANT SYSTEMS

### B 3.7.8 Essential Service Water (SX) System

#### BASES

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#### BACKGROUND

The SX System provides a heat sink for the removal of process and operating heat from safety related components during a Design Basis Accident (DBA) or transient. During normal operation, and a normal shutdown, the SX System also provides this function for various safety related and nonsafety related components. The safety related function is covered by this LCO.

The unit-specific SX System consists of two separate, electrically independent, 100% capacity, safety related, cooling water trains. Each train consists of a 100% capacity pump, piping, valving, and instrumentation. The pumps and valves are remote and manually aligned, except in the unlikely event of a Loss Of Coolant Accident (LOCA). The pumps are automatically started upon receipt of a safety injection signal or an undervoltage on the ESF bus, and all essential valves are aligned to their post accident positions (Diesel Generator (DG) supply valves are opened once the DG has reached sufficient rpm). The SX System is the backup water supply to the Auxiliary Feedwater System.

The SX System includes provisions to crosstie the trains (unit-specific crosstie), as well as provisions to crosstie the units (opposite-unit crosstie). The opposite-unit crosstie valves (1SX005 and 2SX005) must both be open to accomplish the opposite-unit crosstie. The system is normally aligned with the unit-specific crosstie valves open and the opposite-unit crosstie valves closed.

Additional information about the design and operation of the SX System, along with a list of the components served, is presented in the UFSAR, Section 9.2.1 (Ref. 1). Some of the functions served by the SX System are the removal of decay heat from the reactor via the Component Cooling Water (CC) System, the removal of heat from containment via the reactor containment fan coolers, and cooling of the DGs.

## BASES

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### APPLICABLE SAFETY ANALYSES

The design basis of the SX System is for one SX train, in conjunction with the CC System and a 100% capacity containment cooling system, to remove core decay heat following a design basis LOCA as discussed in the UFSAR, Section 6.2 (Ref. 2). This prevents the containment sump fluid from increasing in temperature during the recirculation phase following a LOCA and provides for a gradual reduction in the temperature of this fluid as it is supplied to the Reactor Coolant System by the Emergency Core Cooling System pumps. The SX System is designed to perform its function with a single failure of any active component, assuming the loss of offsite power.

The SX System, in conjunction with the CC System, also cools the unit from Residual Heat Removal (RHR) entry conditions, as discussed in the UFSAR, Section 5.4.7, (Ref. 3) to MODE 5 during normal and post accident operations. The time required for this evolution is a function of the number of CC and RHR System trains that are operating. One SX train is sufficient to remove decay heat during subsequent operations in MODES 5 and 6.

Generic Letter 91-13 (Ref. 4) included risk-based recommendations for enhancing the availability of SX Systems, in the case of a loss of all SX to a particular unit. Crediting the opposite-unit SX System with an opposite-unit pump and the opposite-unit crosstie valves, was a part of the response to this Generic Letter.

The unit-specific SX System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii). The opposite-unit SX System satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

Two unit-specific SX trains are required to be OPERABLE to provide the required redundancy to ensure that the system functions to remove post accident heat loads, assuming that the worst case single active failure occurs coincident with the loss of offsite power.

A unit-specific SX train is considered OPERABLE during MODES 1, 2, 3, and 4 when:

- a. The pump is OPERABLE; and
- b. The associated piping, valves, and instrumentation and controls required to perform the safety related function are OPERABLE.

An opposite-unit SX train is considered OPERABLE during MODES 1, 2, 3, and 4 when:

- a. An opposite-unit pump is capable of performing its required unit-specific function (manually start and supply SX to the flow path);
- b. A flow path from the opposite unit is established, or capable of being established (including the opposite-unit crosstie valves 1SX005 and 2SX005); and
- c. The associated piping, valves, and instrumentation and controls are capable of performing the crosstie function.

## BASES

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**APPLICABILITY** In MODES 1, 2, 3, and 4, the unit-specific SX System is a normally operating system that is required to support the OPERABILITY of the equipment serviced by the SX System and required to be OPERABLE in these MODES.

While a specific unit is in MODES 1, 2, 3, or 4, the opposite-unit SX System must be available (independent of the opposite unit's MODE or condition) for unit-specific support. This minimizes the risk associated with loss of all unit-specific SX.

In MODES 5 and 6 the OPERABILITY requirements of the unit-specific SX System are determined by the systems it supports and there are no opposite-unit SX System requirements.

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## ACTIONS

### A.1

If one unit-specific SX train is inoperable, action must be taken to restore OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE SX train is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE SX train could result in loss of the SX System function in the short term. The 72 hour Completion Time is based on the redundant capabilities afforded by the OPERABLE train, and the low probability of a DBA occurring during this time period.

Required Action A.1 is 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 if an inoperable SX train results in an inoperable emergency diesel generator. 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 SX train results in an inoperable decay heat removal train. These are exceptions to LCO 3.0.6 and ensure the proper actions are taken for these components.

BASES

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ACTIONS (continued)

B.1

If the opposite-unit SX train is not OPERABLE for unit-specific support, action must be taken to restore OPERABLE status within 7 days. In this Condition, if a complete loss of unit-specific SX were to occur, the SX System function would be lost. The 7 day Completion Time is based on the capabilities of the unit-specific SX System and the low probability of a DBA with a loss of all unit-specific SX occurring during this time period.

Required Action B.1 is modified by a Note that states LCO 3.0.4 is not applicable. This exception to LCO 3.0.4 is based on the redundancy of the unit-specific trains and the design basis analysis takes no credit for the opposite-unit train.

C.1 and C.2

If the unit-specific SX train or the opposite-unit SX train 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 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 plant systems.



BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.8.1

Verifying the correct alignment for manual, power operated, and automatic valves in the unit-specific SX flow path provides assurance that the proper flow paths exist for unit-specific SX 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. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

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

This SR is modified by a Note indicating isolation of the SX components does not affect the OPERABILITY of the SX System. Isolation of components may render those components inoperable.

SR 3.7.8.2

This SR verifies that the opposite-unit SX pump can be run for  $\geq 15$  minutes. This SR does not require the opposite-unit pump to supply SX to the specific unit. SR 3.7.8.2 is modified by a note that only requires this surveillance to be performed when the opposite unit is in MODE 5 or 6 or has no fuel in the reactor vessel. If the opposite unit is in MODE 1, 2, 3, or 4, its SX System is normally operating. If the opposite unit is shut down, the credited SX pump may not be operating. Therefore, the Note requires the surveillance to be performed. The 31 day Frequency is based on engineering judgment, considering the activities of the opposite unit and knowledge of plant status available to the control room operators.

## BASES

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SURVEILLANCE REQUIREMENTS (continued)SR 3.7.8.3

This SR verifies proper operation of the opposite-unit SX crosstie valves (1SX005 and 2SX005). This Surveillance is not required if the opposite-unit SX crosstie valve is secured in the open position with power removed. The 92 day frequency is based on the inservice testing requirements for these valves.

SR 3.7.8.4

This SR verifies proper automatic operation of the unit-specific SX System valves on an actual or simulated actuation signal. The SX System is a normally operating system that 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. The 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. 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.

SR 3.7.8.5

This SR verifies proper automatic operation of the unit-specific SX pumps on an actual or simulated actuation signal. The SX System is a normally operating system that cannot be fully actuated as part of normal testing during normal operation. The 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. 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.

BASES

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REFERENCES

1. UFSAR, Section 9.2.1.
2. UFSAR, Section 6.2.
3. UFSAR, Section 5.4.7.
4. Generic Letter 91-13.

## B 3.7 PLANT SYSTEMS

### B 3.7.9 Ultimate Heat Sink (UHS)

#### BASES

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##### BACKGROUND

The UHS provides a heat sink for processing and operating heat from safety related components during a transient or accident, as well as during normal operation. This is done by utilizing the Essential Service Water (SX) System and the Component Cooling Water (CC) System.

The UHS consists of an excavated essential cooling pond integral with the main cooling pond, and the piping and valves connecting the pond with the SX System pumps. The UHS is described in UFSAR, Section 9.2.5 (Ref. 1). The two principal functions of the UHS are the dissipation of residual heat after reactor shutdown, and dissipation of residual heat after an accident.

The basic performance requirements are that a 30 day supply of water be available, and that the design basis temperatures of safety related equipment not be exceeded. The UHS is sufficiently oversized to permit a minimum of 30 days of operation with no makeup.

Additional information on the design and operation of the system, along with a list of components served, can be found in Reference 1.

BASES

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APPLICABLE  
SAFETY ANALYSES

The UHS is the sink for heat removed from the reactor core following all accidents and anticipated operational occurrences in which the unit is cooled down and placed on Residual Heat Removal (RHR) operation. The UHS is also the normal heat sink for condenser cooling via the Circulating Water System. Unit operation at full power represents the UHS maximum heat load. Its maximum post accident heat load occurs 20 minutes after a design basis Loss Of Coolant Accident (LOCA). Near this time, the unit switches from injection to recirculation and the containment cooling systems and RHR are required to remove the core decay heat.

The operating limits are based on conservative heat transfer analyses for the worst case LOCA. Reference 1 provides the details of the assumptions used in the analysis, which include worst expected meteorological conditions, conservative uncertainties when calculating decay heat, and worst case single active failure (e.g., single failure of a manmade structure). The UHS is designed in accordance with Regulatory Guide 1.27 (Ref. 2), which requires a 30 day supply of cooling water in the UHS.

The UHS satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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## LCO

The UHS is required to be OPERABLE and is considered OPERABLE if it contains a sufficient volume of water at or below the maximum temperature that would allow the SX System to operate for at least 30 days following the design basis LOCA without the loss of Net Positive Suction Head (NPSH), and without exceeding the maximum design temperature of the equipment served by the SX System. To meet this condition, the UHS temperature should not exceed 98°F and the level should not fall below 590 ft mean sea level during normal unit operation.

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## APPLICABILITY

In MODES 1, 2, 3, and 4, the UHS is required to support the OPERABILITY of the equipment serviced by the UHS and required to be OPERABLE in these MODES.

In MODE 5 or 6, the OPERABILITY requirements of the UHS are determined by the systems it supports.

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## BASES

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### ACTIONS

#### A.1 and A.2

If the UHS is inoperable, 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 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 plant systems.

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### SURVEILLANCE REQUIREMENTS

#### SR 3.7.9.1

This SR verifies that adequate long term (30 day) cooling can be maintained. The specified level also ensures that sufficient NPSH is available to operate the SX pumps. The 24 hour Frequency is based on operating experience related to trending of the parameter variations during the applicable MODES. This SR verifies that the UHS water level is  $\geq 590$  ft mean sea level United States Geological Society datum.

#### SR 3.7.9.2

This SR verifies that the SX System is available to cool the CC System to at least its maximum design temperature with the maximum accident or normal design heat loads for 30 days following a Design Basis Accident. The 24 hour Frequency is based on operating experience related to trending of the parameter variations during the applicable MODES. This SR verifies that the average water temperature of the UHS is  $\leq 98^{\circ}\text{F}$ , as measured at the discharge of an SX pump.

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## BASES

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SURVEILLANCE REQUIREMENTS (continued)SR 3.7.9.3

This surveillance verifies that the UHS contains adequate storage volume to supply the required design basis inventory to support the function of the essential service water system. SR 3.7.9.1 verifies the contained volume of the UHS, while this SR verifies that the UHS, if filled to the depth required by SR 3.7.9.1, can supply the water required to support the safety function of the system.

SR 3.7.9.3 assures that the bottom elevation of the UHS is less than or equal to 584 ft Mean Sea Level (MSL). This surveillance is performed by means of a hydrographic survey, once every 18 months. The frequency is based on engineering judgement and the likelihood that any geologic or natural event that significantly altered the bottom elevation of the UHS in a shorter period would be identified by other means.

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REFERENCES

1. UFSAR, Section 9.2.5.
2. Regulatory Guide 1.27.

## B 3.7 PLANT SYSTEMS

### B 3.7.10 Control Room Ventilation (VC) Filtration System

#### BASES

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#### BACKGROUND

The common control room filtration and temperature control are provided by the Control Room Ventilation (VC) System. The common VC System consists of two redundant and independent trains. Each train consists of a makeup air filter unit, makeup air fan, supply fan, return fan, supply filter unit, recirculation charcoal adsorber, comfort heating coils (not required for OPERABILITY), chiller, chilled water pump and cooling coils. Ductwork, dampers, and instrumentation also form part of the system.

The makeup air filter unit includes a moisture separator (not required for system OPERABILITY), heater, prefilter (not required for system OPERABILITY), High Efficiency Particulate Air (HEPA) filter, charcoal adsorber section for removal of gaseous activity (principally iodines), and second HEPA filter. The moisture separator removes any entrained water. The prefilter removes any large particles in the air to prevent excessive loading of the HEPA filters and charcoal adsorbers. Continuous operation of each makeup filter unit for at least 10 hours per month, with the heaters on, reduces moisture buildup on the HEPA filters and charcoal adsorbers.

The VC System operation in maintaining the control room temperature within limits and habitable is discussed in UFSAR, Section 6.4 (Ref. 1) and Section 9.4 (Ref. 2). The VC System (with the exception of the comfort heating coils and humidifier) is designed in accordance with Seismic Category I requirements. The VC System is an emergency system of which parts operate during normal operation. Normally, the supply and return fans of one train are in service with the recirculation charcoal adsorber bypassed. The makeup air filter unit and fan are not in service.

The filtration system portion of the VC System (VC Filtration System) provides a protected environment from which operators can control the unit following an uncontrolled release of radioactivity.



## BASES

### BACKGROUND (continued)

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Actuation of the VC Filtration System places the system in the emergency mode of operation. Actuation of the system to the emergency mode of operation; starts the makeup fan, opens the turbine building intake damper, isolates the normal intake from outside dampers, isolates the purge dampers (if open), opens the recirculation charcoal adsorber dampers, and closes the recirculation charcoal adsorber bypass dampers. If operating, the operating supply and return fans continue to operate. Interlocks are provided such that the makeup fan will not start unless the associated supply fan is in operation. Outside air is filtered and added to the air being recirculated through the control room. Pressurization of the control room prevents infiltration of unfiltered air from the surrounding areas of the building.

The air entering the control room is continuously monitored by radiation detectors. One detector output above the alarm setpoint will cause actuation of the emergency mode of operation.

One VC Filtration System train can pressurize the upper cable spreading room to  $\geq 0.02$  inches water gauge and the control room to  $\geq 0.125$  inches water gauge, relative to areas adjacent to the control room area.

Redundant filter trains are provided such that if an excessive pressure drop develops across one filter train, the other train is available to provide the required filtration.

The normally open intake isolation dampers are arranged in a series so that the failure of one damper to shut will not result in a breach of isolation. The VC Filtration System is designed in accordance with Seismic Category I requirements.

The VC Filtration System is designed to maintain the control room environment for 30 days of continuous occupancy after a Design Basis Accident (DBA) without exceeding a 5 rem whole body dose or its equivalent to any part of the body.

BASES

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APPLICABLE  
SAFETY ANALYSES

The VC System components are arranged in redundant, safety related ventilation trains. The location of components and ducting within the control room envelope ensures an adequate supply of filtered air to all areas requiring access. The VC Filtration System provides airborne radiological protection for the control room operators, as demonstrated by the control room accident dose analyses for the most limiting design basis loss of coolant accident, fission product release presented in the UFSAR, Chapter 15 (Ref. 3). The safety analyses assume a 99% filter efficiency for the makeup air filter unit and a 90% filter efficiency for the recirculation charcoal adsorber.

As described in UFSAR Section 6.4 (Ref. 1) and Section 2.2 (Ref. 4), the only potential toxic releases that could pose a risk to the control room operators, are from offsite sources. The probability of such a release is low and there would be sufficient time upon notification to initiate the VC isolation mode of operation.

The worst case single active failure of a component of the VC Filtration System, assuming a loss of offsite power, does not impair the ability of the system to perform its design function.

The VC Filtration System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

Two independent and redundant VC Filtration System trains are required to be OPERABLE to ensure that at least one is available assuming a single failure disables the other train. Total system failure could result in exceeding a dose of 5 rem to the control room operator in the event of a large radioactive release.

The VC Filtration System is considered OPERABLE when the individual components necessary to limit operator exposure are OPERABLE in both trains. A VC Filtration System train is OPERABLE when the associated:

- a. Makeup air fan is OPERABLE;
- b. Supply fan is OPERABLE;
- c. Return air fan is OPERABLE;
- d. HEPA filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions; and
- e. Makeup filter unit heater, ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

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

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### APPLICABILITY

In MODES 1, 2, 3, 4, 5, and 6, and at all times during movement of irradiated fuel assemblies in the fuel handling building or containment, the VC Filtration System must be OPERABLE to control operator exposure during and following a DBA, including the release from a fuel handling accident.

In MODE 5 or 6, the VC Filtration System provides protection from significant radioactive releases.

BASES

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ACTIONS

A.1

When one VC Filtration System train is inoperable, action must be taken to restore OPERABLE status within 7 days. In this Condition, the remaining OPERABLE VC Filtration System train is adequate to perform the control room protection function. However, the overall reliability is reduced because a single failure in the OPERABLE VC Filtration System train could result in loss of VC Filtration System function. 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.

B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable VC Filtration System train cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit 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 plant systems.

## BASES

## ACTIONS (continued)

C.1.1, C.1.2, C.2.1, C.2.2, and C.2.3

In MODE 5 or 6, or during movement of irradiated fuel assemblies, if the inoperable VC Filtration System train cannot be restored to OPERABLE status within the required Completion Time, action must be taken to immediately place the OPERABLE VC Filtration System train in the emergency mode. 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. Action C.1.2 requires the VC Filtration System train placed in operation be capable of being powered by an OPERABLE emergency power source. This action assures availability of electric power in the unlikely event of a loss of offsite power. This power source can be either from Unit 1 or Unit 2, via OPERABLE crosstie breakers.

An alternative to Required Action C.1.1 and C.1.2 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

D.1, D.2, and D.3

In MODE 5 or 6, or during movement of irradiated fuel assemblies, with two VC Filtration System trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the control room. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

E.1

If both VC Filtration System trains are inoperable in MODE 1, 2, 3, or 4, the VC Filtration System may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

BASES

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SURVEILLANCE  
REQUIREMENTSSR 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 operation dries out any moisture accumulated in the charcoal from humidity in the ambient air. The makeup air filter unit includes heaters. Therefore, the subsystem must be initiated from the control room and operated for  $\geq 10$  continuous hours with the heaters energized. The recirculation subsystem filters do not contain heaters and need only be operated for  $\geq 15$  minutes to demonstrate the function of the system. For purposes of satisfying this SR, the recirculation subsystem may be run concurrently with the makeup subsystem. The 31 day Frequency is based on the reliability of the equipment and the two train redundancy availability.

SR 3.7.10.2

This SR verifies that the required VC Filtration System testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VC Filtration System filter tests are in general conformance with Regulatory Guide 1.52 (Ref. 5). The VFTP includes testing the performance of the HEPA filter, charcoal adsorber efficiency, system flow rates, and the physical properties of the activated charcoal. Specific test Frequencies and additional information are discussed in detail in the VFTP. The acceptance criteria stated in the VFTP, ensure that the filter efficiencies assumed in the safety analyses are met.

SR 3.7.10.3

This SR verifies that each VC Filtration System train aligns, starts, and operates on an actual or simulated actuation signal. The Frequency of 18 months is specified in Regulatory Guide 1.52 (Ref. 5).

BASES

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SURVEILLANCE REQUIREMENTS (continued)

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 VC Filtration System. During the emergency mode of operation, the VC Filtration System is designed to pressurize the upper cable spreading room to  $\geq 0.02$  inches water gauge and the control room to  $\geq 0.125$  inches water gauge, relative to areas adjacent to the control room area in order to prevent unfiltered inleakage. The VC Filtration System is designed to maintain this positive pressure with one train at a makeup flow rate  $\geq 5400$  cfm and  $\leq 6600$  cfm. The Frequency of 18 months on a STAGGERED TEST BASIS is consistent with the guidance provided in NUREG-0800 (Ref. 6).

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REFERENCES

1. UFSAR, Section 6.4.
2. UFSAR, Section 9.4.
3. UFSAR, Chapter 15.
4. UFSAR, Section 2.2.
5. Regulatory Guide 1.52, Rev. 2.
6. NUREG-0800, Section 6.4, Rev. 2, July 1981.

## B 3.7 PLANT SYSTEMS

### B 3.7.11 Control Room Ventilation (VC) Temperature Control System

#### BASES

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##### BACKGROUND

The temperature control system portion of the VC System (VC Temperature Control System) provides temperature control for the control room normally and following isolation of the control room. A description of the VC System is provided in the Bases for LCO 3.7.10, "Control Room Ventilation (VC) Filtration System."

The VC Temperature Control System consists of the VC components (arranged in two independent and redundant trains) that provide cooling and heating of recirculated control room air. Each train consists of heating coils (not required for System OPERABILITY), a chiller, a chilled water pump, cooling coils, instrumentation, and controls to provide for control room temperature control. The heat load for the chillers is rejected to the Essential Service Water System. A single VC Temperature Control System train will provide the required temperature control to maintain the control room  $\leq 90^{\circ}\text{F}$ .

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##### APPLICABLE SAFETY ANALYSES

The design basis of the VC Temperature Control System is to maintain the control room temperature for 30 days of continuous occupancy.

The VC Temperature Control System components are arranged in redundant, safety related trains. During emergency operation, the VC Temperature Control System will maintain the temperature  $\leq 90^{\circ}\text{F}$ . A single active failure of a component of the VC Temperature Control System, with a loss of offsite power, does not impair the ability of the system to perform its design function. Redundant detectors and controls are provided for control room temperature control. The VC Temperature Control System is designed in accordance with Seismic Category I requirements. The VC Temperature Control System is capable of removing sensible and latent heat loads from the control room, which include consideration of equipment heat loads and personnel occupancy requirements, to ensure equipment OPERABILITY.

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BASES

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APPLICABLE SAFETY ANALYSES (continued)

The VC Temperature Control System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

Two independent and redundant trains of the VC Temperature Control System are required to be OPERABLE to ensure that at least one is available, assuming a single failure disabling the other train. Total system failure could result in the equipment operating temperature exceeding limits in the event of an accident.

The VC Temperature Control System is considered to be OPERABLE when the individual VC components necessary to maintain the control room temperature  $\leq 90^{\circ}\text{F}$  are OPERABLE in both trains. These components include the chillers, chilled water pumps, cooling coils, associated duct work, and associated temperature control instrumentation. In addition, other VC components must be capable of maintaining air circulation.

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APPLICABILITY

In MODES 1, 2, 3, 4, 5, and 6, and at all times during movement of irradiated fuel assemblies in the fuel handling building or containment, the VC Temperature Control System must be OPERABLE to ensure that the control room temperature will not exceed equipment operational requirements following isolation of the control room.

BASES

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ACTIONS

A.1

With one VC Temperature Control System train inoperable, action must be taken to restore OPERABLE status within 30 days. In this Condition, the remaining OPERABLE VC Temperature Control System train is adequate to maintain the control room temperature within limits. However, the overall reliability is reduced because a single failure in the OPERABLE VC Temperature Control System train could result in loss of VC Temperature Control System function. The 30 day Completion Time is based on the low probability of an event requiring control room isolation, the consideration that the remaining train can provide the required protection, and that alternate safety or nonsafety related cooling means are available.

B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable VC Temperature Control System train cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes the risk. To achieve this status, the unit 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 plant systems.

BASES

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ACTIONS (continued)

C.1.1, C.1.2, C.2.1, C.2.2, and C.2.3

In MODE 5 or 6, or during movement of irradiated fuel, if the inoperable VC Temperature Control System train cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE VC Temperature Control System train must be placed in operation immediately. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that active failures will be readily detected. Action C.1.2 requires the VC Temperature Control System train placed in operation be capable of being powered by an OPERABLE emergency power source. This action assures availability of electric power in the unlikely event of a loss of offsite power. This power source can be either from Unit 1 or Unit 2, via OPERABLE crosstie breakers.

An alternative to Required Action C.1.1 and C.1.2 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

D.1, D.2, and D.3

In MODE 5 or 6, or during movement of irradiated fuel assemblies, with two VC Temperature Control System trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

E.1

If both VC Temperature Control System trains are inoperable in MODE 1, 2, 3, or 4, the control room VC Temperature Control System may not be capable of performing its intended function. Therefore, LCO 3.0.3 must be entered immediately.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.11.1

This SR monitors the control room temperature for indication of VC Temperature Control System performance. Trending of control room temperature will provide a qualitative assessment of VC Temperature Control System chiller OPERABILITY. The 12 hour Frequency is adequate considering the continuous manning of the control room by the operating staff.

SR 3.7.11.2

This SR verifies that the heat removal capability of the system is sufficient to remove the required heat load. This SR consists of a combination of testing and calculations. The 18 month Frequency is appropriate since significant degradation of the VC Temperature Control System is slow and is not expected over this time period.

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REFERENCES

None.

BASES

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B 3.7 PLANT SYSTEMS

B 3.7.12 Nonaccessible Area Exhaust Filter Plenum Ventilation System

BASES

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BACKGROUND

The Nonaccessible Area Exhaust Filter Plenum Ventilation System filters air from the area of the active Emergency Core Cooling System (ECCS) components during the recirculation phase of a Loss Of Coolant Accident (LOCA). The Nonaccessible Area Exhaust Filter Plenum Ventilation System, in conjunction with other normally operating systems, also provides environmental control of temperature in the ECCS pump room area and the lower reaches of the auxiliary building.

The Nonaccessible Area Exhaust Filter Plenum Ventilation System is a subsystem of the common auxiliary building heating, ventilation and air conditioning system (VA). Each unit has two VA supply and two VA exhaust fans. The VA supply and exhaust fans are not required for Nonaccessible Area Exhaust Filter Plenum Ventilation System OPERABILITY.

The Nonaccessible Area Exhaust Filter Plenum Ventilation System consists of three 50% trains. Each train consists of prefilters, High Efficiency Particulate Air (HEPA) filters, activated charcoal adsorber sections for removal of gaseous activity (principally iodines), and two 100% capacity fans. Ductwork, dampers, and instrumentation also form part of the system. A second bank of HEPA filters follows the adsorber sections to collect carbon fines and provide backup in case the main HEPA filter bank fails. The prefilters remove any large particles in the air to prevent excessive loading of the HEPA filters and charcoal adsorbers. Each fan in a train is powered from a different ESF bus. Train A fans are powered by Unit 1 buses 131 and 132; train B fans are powered by Unit 2 buses 231 and 232; and train C fans are powered by Unit 1 bus 132 and Unit 2 bus 231.

BASES

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BACKGROUND (continued)

The system is normally aligned with two inlet dampers open and the third train's inlet damper closed. The air passes through the HEPA filters and is routed to the auxiliary building exhaust plenum. The system initiates following receipt of a Safety Injection (SI) signal from either unit. During the emergency mode operation, the auxiliary building normal supply and exhaust fans associated with the unit generating the SI signal are tripped (if operating and there is a concurrent loss of offsite power to that unit). The supply and exhaust fans for the unaffected unit continue to operate or are available if required. The Nonaccessible Area Exhaust Filter Plenum Ventilation System dampers realign, and a fan in each train with an open inlet damper starts to begin filtration. Interlocks are provided; to start the second fan after a time delay in a train if the first fan does not start; to prevent start of a fan in a train with a closed inlet damper; and to prevent start of a fan with a closed discharge damper. The train with the closed inlet damper can be realigned manually from the control room, if required. The Nonaccessible Area Exhaust Filter Plenum Ventilation System emergency mode of operation can also be initiated manually by starting a fan in each train that is aligned for operation. A manual fan start signal will realign the associated dampers to begin filtration.

The Nonaccessible Area Exhaust Filter Plenum Ventilation System is discussed in the UFSAR, Sections 6.5.1, 9.4.5, and 15.6.5 (Refs. 1, 2, and 3, respectively).

BASES

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APPLICABLE  
SAFETY ANALYSES

The design basis of the Nonaccessible Area Exhaust Filter Plenum Ventilation System is established by the large break LOCA. The system evaluation assumes a passive failure of the ECCS outside containment, such as an SI pump seal failure, during the recirculation mode. In such a case, the system limits radioactive release to within the 10 CFR 100 (Ref. 4) limits, or the NRC staff approved licensing basis (e.g., a specified fraction of Reference 5 limits). While the system is automatically initiated on an SI signal, manual actuation/alignment of the system is acceptable. The system is not required until initiation of the ECCS recirculation mode. The analysis of the effects and consequences of a large break LOCA is presented in Reference 3. The Nonaccessible Area Exhaust Filter Plenum Ventilation System also actuates following a small break LOCA, in those cases where the ECCS goes into the recirculation mode of long term cooling, to clean up releases of smaller leaks, such as from valve stem packing. The Nonaccessible Area Exhaust Filter Plenum Ventilation System is also credited in the control room habitability analysis (Ref. 5). The safety analyses assume a 90% filter efficiency.

Two types of system failures are considered in the accident analysis: complete loss of function, and excessive LEAKAGE. Either type of failure may result in a lower efficiency of removal for any gaseous and particulate activity released to the ECCS pump rooms following a LOCA.

The Nonaccessible Area Exhaust Filter Plenum Ventilation System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).



BASES

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LCO

The Nonaccessible Area Exhaust Filter Plenum Ventilation System is required to be OPERABLE to ensure that atmospheric releases from the ECCS pump rooms do not exceed those assumed in the safety analysis. Total system failure could result in the atmospheric release, 1) exceeding 10 CFR 100 limits in the event of a Design Basis Accident (DBA), and 2) exceeding the limits for control room habitability. The Nonaccessible Area Exhaust Filter Plenum Ventilation System is considered OPERABLE when the individual components, necessary to maintain ECCS pump rooms and equipment rooms filtration are OPERABLE.

In order for the Nonaccessible Area Exhaust Filter Plenum Ventilation System to perform its function, filtration and motive flow must be provided by two of the three trains, the bypass path(s) to the normal auxiliary building exhaust system must be isolated, and the third train's inlet damper must be closed. The closure of the third train's inlet damper, prevents starting of a third fan and also ensures filtration of the exhaust from the ECCS pump rooms, by eliminating potential bypass flow paths.

Three trains of the Nonaccessible Area Exhaust Filter Plenum Ventilation System are required to be OPERABLE to ensure that at least two are available, assuming a single failure coincident with loss of offsite power on the affected unit and an orderly shutdown on the other unit. In addition due to design considerations, two of the trains must be aligned for operation and one train must be aligned in standby (i.e., the inlet damper closed).

To accommodate the single failure and loss of offsite power assumptions, the required fans in each of the Nonaccessible Area Exhaust Filter Plenum Ventilation System trains must be independent of the credited fans in the other trains.

BASES

LCO (continued)

A Nonaccessible Area Exhaust Filter Plenum Ventilation System train is considered OPERABLE when:

- a. A charcoal booster fan which is powered from a power supply different than the other two trains is OPERABLE;
- b. HEPA filters and charcoal adsorbers are not excessively restricting flow, and are capable of performing their filtration functions; and
- c. Ductwork and dampers are OPERABLE, and air circulation can be maintained.

The alignment of an Nonaccessible Area Exhaust Filter Plenum Ventilation System train for operation or in standby does not affect the OPERABILITY of the train. For example, alignment of an inoperable train for operation and an OPERABLE train in standby for the purpose of testing the inoperable train, represents a Condition of only one train inoperable.

The LCO is modified by a Note that allows suspension of the requirement to have two trains aligned for operation and one train aligned in standby, intermittently under administrative controls. This allowance is in recognition that for the short time period when a train is realigned for operation from standby and another train is realigned to standby from operation, that more than one damper may be closed or more than two dampers may be opened. These conditions would normally result in the loss of Nonaccessible Area Exhaust Filter Plenum Ventilation System functional capability.

APPLICABILITY

In MODES 1, 2, 3, and 4, the Nonaccessible Area Exhaust Filter Plenum Ventilation System is required to be OPERABLE consistent with the OPERABILITY requirements of the ECCS.

In MODE 5 or 6, the Nonaccessible Area Exhaust Filter Plenum Ventilation System is not required to be OPERABLE since the ECCS is not required to be OPERABLE.

BASES

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ACTIONS

A.1

With one Nonaccessible Area Exhaust Filter Plenum Ventilation System train inoperable, action must be taken to restore OPERABLE status within 7 days. During this time, the remaining OPERABLE trains are adequate to perform the Nonaccessible Area Exhaust Filter Plenum Ventilation System function.

The 7 day Completion Time is appropriate because the risk contribution is less than 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 trains to provide the required capability.

If only two fans are powered from different power supplies, one train should be declared inoperable. Securing closed the inoperable train's inlet damper and assuring the other inlet dampers are open, maintains functional capability of the system.

If more than one inlet damper is inoperable, only one train need be declared inoperable, provided one inoperable damper is secured in the closed position and the other damper(s) are secured in the open position (with its associated fan(s) starting interlock enabled).

If two or more inlet dampers are closed, a single failure of the damper(s) to open would result in the loss of functional capability. Concurrent failure of two or more Nonaccessible Area Exhaust Filter Plenum Ventilation System trains would also result in the loss of functional capability. For any loss of functional capability, LCO 3.0.3 must be entered immediately.

BASES

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ACTIONS (continued)

B.1 and B.2

If the Nonaccessible Area Exhaust Filter Plenum Ventilation System train 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 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.12.1

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not severe, testing each train once a month provides an adequate check on this system. Monthly system operation for  $\geq 15$  minutes demonstrates the function of the system. The 31 day Frequency is based on the known reliability of equipment and the redundancy available.

SR 3.7.12.2

This SR verifies that the required Nonaccessible Area Exhaust Filter Plenum Ventilation System testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The Nonaccessible Area Exhaust Filter Plenum Ventilation System filter tests are in general conformance with Reference 6. The VFTP includes testing HEPA filter performance, charcoal adsorbers efficiency, system flow rates, and the physical properties of the activated charcoal (general use and following specific operations). Specific test Frequencies and additional information are discussed in detail in the VFTP. The acceptance criteria stated in the VFTP ensure that the filter efficiencies assumed in the safety analyses are met.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.12.3

This SR verifies that each Nonaccessible Area Exhaust Filter Plenum Ventilation System train aligns, starts, and operates on a manual, an actual, or a simulated actuation signal. The 18 month Frequency is consistent with that specified in Reference 6.

SR 3.7.12.4

This SR verifies the integrity of the ECCS pump room areas. The ability of the ECCS pump room areas to maintain a negative pressure, with respect to potentially uncontaminated adjacent areas, is periodically tested to verify proper functioning of the Nonaccessible Area Exhaust Filter Plenum Ventilation System. During the emergency mode of operation, the Nonaccessible Area Exhaust Filter Plenum Ventilation System is designed to maintain a slight negative pressure in the ECCS pump rooms, with respect to adjacent areas, to prevent unfiltered LEAKAGE. The Nonaccessible Area Exhaust Filter Plenum Ventilation System is designed to maintain a  $\leq -0.25$  inches water gauge relative to atmospheric pressure with two trains operating, each at a flow rate  $\leq 73,590$  cubic feet per minute (cfm). Nonaccessible Area Exhaust Filter Plenum Ventilation System function must be maintained considering the design basis scenarios of an SI signal only on one unit or an SI signal concurrent with a loss of offsite power to a unit. This SR should be performed with the postulated number of VA supply and exhaust fans running considering the SI signal only scenario. Performance of the SR in this manner produces the least negative pressure in the ECCS pump room areas (i.e., the least margin to  $\leq -0.25$  inches water gauge). The Frequency of 18 months is consistent with the guidance provided in NUREG-0800, Section 6.5.1 (Ref. 7).

The testing of two of the three trains on an 18 month Frequency on a STAGGERED TEST BASIS, requires that the combination of trains be varied, such that all possible combinations of trains be tested over a 54 month period.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

If a particular pump room is isolated such that there is no potential for post accident fluids to pass through the room, or that room's ECCS equipment is not required, that room can be excluded from meeting the acceptance criteria of the SR. Performance of this SR with a room excluded, represents a change in the ECCS pump room area volume that the system is maintaining at a negative pressure. Prior to the room being put back in service, this SR would have to be performed with the new volume, to assure that the system can maintain the entire volume at the required negative pressure.

The 18 month Frequency on a STAGGERED TEST BASIS is consistent with that specified in Reference 6.

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REFERENCES

1. UFSAR, Section 6.5.1.
2. UFSAR, Section 9.4.5.
3. UFSAR, Section 15.6.5.
4. 10 CFR 100.11.
5. UFSAR, Section 6.4.
6. Regulatory Guide 1.52 (Rev. 2).
7. NUREG-0800, Section 6.5.1, Rev. 2, July 1981.

BASES

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## B 3.7 PLANT SYSTEMS

### B 3.7.13 Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System

#### BASES

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#### BACKGROUND

The FHB Ventilation System filters airborne radioactive particulates from the area of the fuel pool following a fuel handling accident. The FHB Ventilation System, in conjunction with other normally operating systems, also provides environmental control of temperature in the fuel pool area.

The FHB Ventilation System is a subsystem of the common auxiliary building heating, ventilation, and air conditioning system (VA). Each unit has two VA supply and two VA exhaust fans. The VA supply and exhaust fans are not required for FHB Ventilation System OPERABILITY.

The FHB Ventilation System consists of two independent and redundant trains. Each train consists of a prefilter, a High Efficiency Particulate Air (HEPA) filter, an activated charcoal adsorber section for removal of gaseous activity (principally iodines), and a fan. Ductwork, valves or dampers, and instrumentation also form part of the system. A second bank of HEPA filters follows the adsorber section to collect carbon fines and provide backup in case the main HEPA filter bank fails. The downstream HEPA filter is not credited in the analysis, but serves to collect charcoal fines, and to back up the upstream HEPA filter should it develop a leak. The system initiates filtered ventilation of the fuel handling building following receipt of a high radiation signal or a Safety Injection (SI) on either unit. The FHB Ventilation System start on an SI signal is not credited in any accident analysis.



BASES

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BACKGROUND (continued)

The FHB Ventilation System is a standby system. During normal operation flow from the fuel handling building is routed through the FHB Ventilation System prefilters and HEPA filters and then through the VA exhaust plenum via the VA exhaust fans. Upon FHB Ventilation System actuation (emergency mode of operation), the bypass dampers close, and the FHB Ventilation System fans start, drawing air through the FHB Ventilation System charcoal filters. The prefilters remove any large particles in the air to prevent excessive loading of the HEPA filters and charcoal adsorbers.

The FHB Ventilation System is discussed in the UFSAR, Sections 6.5.1, 9.4.5, and 15.7.4 (Refs. 1, 2, and 3, respectively).

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APPLICABLE  
SAFETY ANALYSES

The FHB Ventilation System design basis is established by the consequences of the limiting Design Basis Accident (DBA), which is a fuel handling accident. The analysis of the fuel handling accident, given in Reference 3, assumes that all fuel rods in an assembly are damaged. The DBA analysis of the fuel handling accident assumes that only one train of the FHB Ventilation System is functional due to a single failure that disables the other train. The accident analysis accounts for the reduction in airborne radioactive material provided by the one remaining train of this filtration system. The amount of fission products available for release from the fuel handling building is determined for a fuel handling accident. These assumptions and the analysis follow the guidance provided in Regulatory Guide 1.25 (Ref. 4). The accident analyses assume a 90% filter efficiency for elemental iodine and a 70% filter efficiency for methyl iodine.

The FHB Ventilation System satisfies Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

Two independent and redundant trains of the FHB Ventilation System are required to be OPERABLE to ensure that at least one train is available, assuming a single failure that disables the other train, coincident with a loss of offsite power. Total system failure could result in the atmospheric release from the fuel handling building exceeding the 10 CFR 100 (Ref. 5) limits in the event of a fuel handling accident.

The FHB Ventilation System is considered OPERABLE when the individual components necessary to control exposure in the fuel handling building are OPERABLE in both trains. An FHB Ventilation System train is considered OPERABLE when its associated:

- a. Fan is OPERABLE;
- b. HEPA filter and charcoal adsorber are not excessively restricting flow, and are capable of performing their filtration function; and
- c. Ductwork, valves, and dampers are OPERABLE, and air circulation can be maintained.

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### APPLICABILITY

During movement of irradiated fuel in the fuel handling building, the FHB Ventilation System is required to be OPERABLE to alleviate the consequences of a fuel handling accident.

During movement of irradiated fuel assemblies or CORE ALTERATIONS in the containment with the containment equipment hatch not intact, the FHB Ventilation System is required to be OPERABLE to mitigate the consequences of an accident inside containment. The equipment hatch is considered not intact if both personnel air lock doors associated with the equipment hatch are open or the hatch is not held in place with at least four bolts.

## BASES

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### ACTIONS

The Actions Table is modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies in the fuel handling building while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODES 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient to require a reactor shutdown.

#### A.1

With one FHB Ventilation System train inoperable, action must be taken to restore OPERABLE status within 7 days. During this period, the remaining OPERABLE train is adequate to perform the FHB Ventilation System function. The 7 day Completion Time is based on the risk from an event occurring requiring the inoperable FHB Ventilation System train, and the remaining FHB Ventilation System train providing the required protection.

#### B.1.1, B.1.2, B.2.1, B.2.2, and B.2.3

When Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE FHB Ventilation System train must be placed in the emergency mode or fuel movement suspended. This action ensures that the remaining train is OPERABLE, that no undetected failures preventing system operation will occur, and that any active failure will be readily detected. Required Action B.1.2 requires the FHB Ventilation System train placed in operation be capable of being powered by an OPERABLE emergency power source. This action assures availability of electric power in the unlikely event of a loss of offsite power. This power source can be from Unit 1 or Unit 2, via OPERABLE crosstie breakers.

If the system is not placed in the emergency mode, Action B.2.1 requires suspension of fuel movement in the fuel handling building, which precludes a fuel handling accident in the fuel handling building. This does not preclude the movement of fuel assemblies to a safe position.

BASES

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ACTIONS (continued)

Required Actions B.2.2 and B.2.3 require suspension of CORE ALTERATIONS and movement of irradiated fuel assemblies inside containment, precluding an accident that might require actuation of the FHB Ventilation System (when the equipment hatch is not intact).

Required Actions B.2.2 and B.2.3 are modified by a Note which indicates that these Required Actions are only required if the equipment hatch is not intact. If the hatch is intact, only Required Action B.2.1 is required.

C.1, C.2, and C.3

When two trains of the FHB Ventilation System are inoperable action must be taken to place the unit in a condition in which the LCO does not apply. Action must be taken immediately to suspend movement of irradiated fuel assemblies in the fuel handling building. This does not preclude the movement of fuel to a safe position.

Required Actions C.2 and C.3 require suspension of CORE ALTERATIONS and movement of irradiated fuel assemblies inside containment, precluding an accident that might require actuation of the FHB Ventilation System (when the equipment hatch is not intact).

Required Actions C.2 and C.3 are modified by a Note which indicates that these Required Actions are only required if the equipment hatch is not intact. If the hatch is intact, only Required Action C.1 is required.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.13.1

Standby systems should be checked periodically to ensure that they function properly. As the environmental and normal operating conditions on this system are not severe, testing each train once every month provides an adequate check on this system.

Monthly system operation for  $\geq 15$  minutes demonstrates the function of the system. The 31 day Frequency is based on the known reliability of the equipment and the two train redundancy available.

SR 3.7.13.2

This SR verifies that the required FHB Ventilation System testing is performed in general conformance with the Ventilation Filter Testing Program (VFTP). The FHB Ventilation System filter tests are in general conformance with Regulatory Guide 1.52 (Ref. 6). The VFTP includes testing HEPA filter performance, charcoal adsorber efficiency, system flow rates, and the physical properties of the activated charcoal (general use and following specific operations). Specific test frequencies and additional information are discussed in detail in the VFTP. The acceptance criteria stated in the VFTP ensure that the filter efficiencies assumed in the safety analyses are met.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.13.3

This SR verifies the integrity of the fuel handling building and containment enclosure. The ability of the fuel handling building and containment to maintain negative pressure with respect to potentially uncontaminated adjacent areas is periodically tested to verify proper function of the FHB Ventilation System and enclosure integrity. During the emergency mode of operation the FHB Ventilation System is designed to maintain a slight negative pressure in the fuel handling building to prevent unfiltered leakage. The FHB Ventilation System is designed to maintain a  $\leq -0.25$  inches water gauge with respect to atmospheric pressure. The Frequency of 7 days on a STAGGERED TEST BASIS, is based on the increased containment activity that occurs when the equipment hatch is not intact, that could affect containment integrity.

This SR is modified by a Note that requires this SR only during movement of irradiated fuel assemblies (in the fuel building or in the containment) or CORE ALTERATIONS when the equipment hatch is not intact.

SR 3.7.13.4

This SR verifies that each FHB Ventilation System train aligns, starts, and operates on an actual or simulated actuation signal. The 18 month Frequency is consistent with Reference 6.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.13.5

This SR verifies the integrity of the fuel handling building enclosure. The ability of the fuel handling building to maintain negative pressure with respect to potentially uncontaminated adjacent areas is periodically tested to verify proper function of the FHB Ventilation System. During the emergency mode of operation the FHB Ventilation System is designed to maintain a slight negative pressure in the fuel handling building, to prevent unfiltered leakage. The FHB Ventilation System is designed to maintain a  $\leq -0.25$  inches water gauge with respect to atmospheric pressure at a flow rate  $\leq 23,100$  cfm to the fuel handling building. The Frequency of 18 months is consistent with the guidance provided in NUREG-0800, Section 6.5.1 (Ref. 7).

An 18 month Frequency (on a STAGGERED TEST BASIS) is consistent with Reference 6.

This SR is modified by a Note that requires this SR only during movement of irradiated fuel assemblies in the fuel handling building when the equipment hatch is intact.

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REFERENCES

1. UFSAR, Section 6.5.1.
2. UFSAR, Section 9.4.5.
3. UFSAR, Section 15.7.4.
4. Regulatory Guide 1.25.
5. 10 CFR 100.
6. Regulatory Guide 1.52 (Rev. 2).
7. NUREG-0800, Section 6.5.1, Rev. 2, July 1981.

## B 3.7 PLANT SYSTEMS

### B 3.7.14 Spent Fuel Pool Water Level

#### BASES

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##### BACKGROUND

The minimum water level in the spent fuel pool meets the assumptions of iodine decontamination factors following a fuel handling accident. The specified water level shields and minimizes the general area dose when the storage racks are filled to their maximum capacity. The water also provides shielding during the movement of spent fuel.

A general description of the spent fuel pool design is given in the UFSAR, Section 9.1.2 (Ref. 1). A description of the Spent Fuel Pool Cooling and Cleanup System is given in the UFSAR, Section 9.1.3 (Ref. 2). The assumptions of the fuel handling accident are given in the UFSAR, Section 15.7.4 (Ref. 3).

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##### APPLICABLE SAFETY ANALYSES

The minimum water level in the spent fuel pool meets the assumptions of the fuel handling accident described in Regulatory Guide 1.25 (Ref. 4). The resultant 2 hour thyroid dose per person at the exclusion area boundary is a small fraction of the 10 CFR 100 limits (Ref. 5).

According to Reference 4, there is 23 ft of water between the top of the damaged fuel bundle and the fuel pool water surface during a fuel handling accident. With 23 ft of water, the assumptions of Reference 4 can be used directly. In practice, this LCO preserves the assumption for the bulk of the fuel in the storage racks. In the case of a single bundle dropped and lying horizontally on top of the spent fuel racks, however, there may be < 23 ft of water above the width of the bundle. To offset this small nonconservatism, the analysis assumes that all fuel rods fail, although analysis shows that only the first few rows fail from a hypothetical maximum drop.

The spent fuel pool water level satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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BASES (continued)

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LCO                    The spent fuel pool water level is required to be  $\geq 23$  ft over the top of irradiated fuel assemblies seated in the storage racks. The specified water level preserves the assumptions of the fuel handling accident analysis (Ref. 3). As such, it is the minimum required for fuel storage and movement within the spent fuel pool.

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APPLICABILITY        This LCO applies during movement of irradiated fuel assemblies in the spent fuel pool, since the potential for a release of fission products exists.

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ACTIONS              The ACTIONS have been modified by a Note indicating that LCO 3.0.3 does not apply.

A.1

When the initial conditions assumed in the accident analysis cannot be met, steps should be taken to preclude the accident from occurring. When the spent fuel pool water level is lower than the required level, the movement of irradiated fuel assemblies in the spent fuel pool is immediately suspended to a safe position. This action effectively precludes the occurrence of a fuel handling accident. This does not preclude movement of a fuel assembly to a safe position.

If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODES 1, 2, 3, and 4, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

BASES (continued)

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.14.1

This SR verifies sufficient spent fuel pool water is available in the event of a fuel handling accident. The water level in the spent fuel pool must be checked periodically. The 7 day Frequency is appropriate because the volume in the pool is normally stable. Water level changes are controlled by plant procedures and are acceptable based on operating experience.

During refueling operations, the level in the spent fuel pool is in equilibrium with the refueling cavity when they are hydraulically coupled, and the level in the refueling cavity is checked daily in accordance with SR 3.9.7.1.

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REFERENCES

1. UFSAR, Section 9.1.2.
2. UFSAR, Section 9.1.3.
3. UFSAR, Section 15.7.4.
4. Regulatory Guide 1.25, May 1972.
5. 10 CFR 100.11.

BASES (continued)

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## B 3.7 PLANT SYSTEMS

### B 3.7.15 Spent Fuel Pool Boron Concentration

#### BASES

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##### BACKGROUND

The spent fuel pool provides for storage of various Westinghouse Optimized Fuel Assembly (OFA) types of different initial fuel enrichments and exposure histories in two distinct regions. (For this discussion, the term OFA is intended to refer to the specific reduced fuel rodlet diameter, and includes all analyzed fuel types with this diameter, such as Vantage 5.) There are 23 separate racks which provide placement locations for a total of 2870 new or used fuel assemblies. Included in this are six specific storage locations in one of the racks for placement of failed fuel assemblies. These locations are identified as the failed fuel storage cells. Of the 23 racks, four are designated "Region 1" with the remaining 19 racks designated as "Region 2". The analytical methodology used to develop the criticality analyses has been reviewed and approved by the NRC (Ref. 1).

Region 1 racks contain 392 cells which are analyzed for storing Westinghouse OFAs in an "All Cells" arrangement (that is, the criticality analysis assumes that spent fuel assemblies reside in all available cell locations, with the exception of the boundary requirements). The stored fuel assemblies may contain an initial nominal enrichment of  $\leq 4.7$  weight percent U-235 (without Integral Fuel Burnable Absorbers (IFBAs) installed) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, provided that the requirement for a minimum number of 16 IFBAs is met (Ref. 2). The IFBAs are required to have, as a minimum, a boron loading of 1.0X, equal to an amount of 1.5 mg B<sup>10</sup>/inch. This is the minimum standard poison material loading offered by Westinghouse for 17X17 OFAs.

Region 2 racks contain 2472 cells which are also analyzed for storing Westinghouse OFAs in a combination of storage configurations. These patterns are:

- 1) "All Cells" Storage;
- 2) "3-out-of-4 Checkerboard" Storage; and
- 3) "2-out-of-4 Checkerboard" Storage.

BASES

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BACKGROUND (continued)

For the "All Cells" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 1.14$  weight percent U-235 (without taking credit for fuel burnup or radioactive decay of fuel constituents) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup and radioactive decay of fuel constituents are credited.

For the "3-out-of-4 Checkerboard" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 1.64$  weight percent U-235 (without taking credit for fuel burnup or radioactive decay of fuel constituents) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup and radioactive decay of fuel constituents are credited. In this storage pattern, there can be no more than three stored assemblies in any 2X2 matrix of cell lattices.

For the "2-out-of-4 Checkerboard" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 4.10$  weight percent U-235 (without taking credit for fuel burnup) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup is credited. In this storage pattern, no two fuel assemblies may be stored "face adjacent" (that is, there must be an empty cell opposite each face of the fuel assembly).

The water in the spent fuel pool normally contains soluble boron which results in large subcriticality margins under actual operating conditions.

BASES

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APPLICABLE  
SAFETY ANALYSES

NRC approved methodologies were used to develop the criticality analyses (Ref. 1). The fuel handling accident analyses are provided in Reference 3. The accident analyses for criticality and spent fuel pool dilution are provided in References 2 and 4, respectively.

The criticality analyses for the spent fuel assembly storage racks confirm that  $k_{eff}$  remains  $< 1.0$  (including uncertainties and tolerances) at a 95% probability with a 95% confidence level (95/95 basis), based on the accident condition of the pool being flooded with unborated water. Thus, the design of both regions assumes the use of unborated water while maintaining stored fuel in a subcritical condition.

However, the presence of soluble boron has been credited to provide adequate safety margin to maintain spent fuel assembly storage rack  $k_{eff} \leq 0.95$  (also on a 95/95 basis) for all postulated accident scenarios involving dropped or misloaded fuel assemblies and loss of spent fuel pool temperature control. Crediting the presence of soluble boron for mitigation of these scenarios is acceptable based on applying the "double contingency principle" which states that there is no requirement to assume two unlikely, independent, concurrent events to ensure protection against a criticality accident (Refs. 5 and 6).

The accident analyses address the following five postulated scenarios:

- 1) fuel assembly drop on top of rack;
- 2) fuel assembly drop between rack modules;
- 3) fuel assembly drop between rack modules and spent fuel pool wall;
- 4) change in spent fuel pool water temperature; and
- 5) fuel assembly loaded contrary to placement restrictions.

Of these, only the last two have the capacity to increase reactivity beyond the analyzed condition.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

Calculations were performed to determine the reactivity change caused by a change in spent fuel pool water temperature outside the normal range (50 - 160°F). For the change in spent fuel pool water temperature accident, a temperature range of 32 - 240°F is considered. In all cases, additional reactivity margin is available to the 0.95  $k_{eff}$  limit to allow for temperature accidents. The temperature change accident can occur at any time during operation of the spent fuel pool.

For the fuel assembly misload accident, calculations were performed to show the largest reactivity increase caused by a Westinghouse 17X17 OFA fuel assembly misplaced into a storage cell for which the restrictions on location, enrichment, or burnup are not satisfied. The assembly misload accident can only occur during fuel handling operations in the spent fuel pool.

For the above postulated accident conditions, the double contingency principle can be applied. Specifically, the presence of soluble boron in the spent fuel pool water can be assumed as a realistic initial condition since not assuming its presence would be a second unlikely event. Spent fuel pool soluble boron has been credited in the criticality safety analysis to offset storage rack and fuel assembly tolerances, calculational uncertainties, uncertainty associated with burnup credit and the reactivity increase caused by postulated accident conditions.

Based on the above discussion, should a spent fuel pool water temperature change accident or a fuel assembly misload accident occur in the Region 1, Region 2, or failed fuel storage cells,  $k_{eff}$  will be maintained  $\leq$  to 0.95 due to the presence of at least 550 ppm (no fuel handling) or 1650 ppm (during fuel handling) of soluble boron in the spent fuel pool water.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

A spent fuel pool dilution analysis (Ref. 4) has been performed as required by Reference 7. The analysis assumes an initial boron concentration of 2000 ppm. The dilution analysis concludes that an unplanned or inadvertent event that would result in the dilution of the spent fuel pool boron concentration from 2000 ppm to 550 ppm (minimum non-accident boron concentration) is not credible.

Interface requirements have been established to ensure  $k_{eff}$  is maintained within the appropriate limits. There are interface requirements between Region 1 racks, between Region 1 and Region 2 racks, between Region 2 racks, and within racks between different checkerboard configurations. These requirements are necessary to account for unique geometries and configurations which exist at the interfaces. Interface requirements exist between adjacent racks to account for the potential reactivity increase in 3-out-of-4 and 2-out-of-4 storage configurations along the interface with non-aligned racks.

The concentration of dissolved boron in the spent fuel pool satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The spent fuel pool boron concentration is required to be  $\geq 2000$  ppm. The specified concentration of dissolved boron in the spent fuel pool preserves the assumptions used in the analyses of the potential critical accident scenarios as described in References 2, 3, and 4. This concentration of dissolved boron is the minimum required concentration for fuel assembly storage and movement within the spent fuel pool.



BASES

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APPLICABILITY      This LCO applies whenever fuel assemblies are stored in the spent fuel pool.

The presence of soluble boron (in various concentrations) is assumed in the criticality analyses and is credited for ensuring that spent fuel pool  $k_{eff}$  will be maintained  $\leq 0.95$  at a 95% confidence level for all storage configurations. The 2000 ppm minimum boron concentration is also an initial condition in the spent fuel pool dilution analysis. Therefore, the restriction on soluble boron concentration in the spent fuel pool water must be maintained at all times when fuel assemblies are stored in the spent fuel pool.

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ACTIONS            The ACTIONS have been modified by a Note indicating that LCO 3.0.3 does not apply.

A.1 and A.2

When the concentration of boron in the spent fuel pool is less than required, immediate action must be taken to preclude the occurrence of an accident or to mitigate the consequences of an accident in progress. This is most efficiently achieved by immediately suspending the movement of fuel assemblies. This does not preclude movement of a fuel assembly to a safe position. Immediate actions are also taken to restore spent fuel pool boron concentration to  $\geq 2000$  ppm.

If moving fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving fuel assemblies while in MODES 1, 2, 3, and 4, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of fuel assemblies is not sufficient reason to require a reactor shutdown.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.15.1

This SR verifies that the concentration of boron in the spent fuel pool is within the required limit. As long as this SR is met, the analyzed accidents are fully addressed.

The 48 hour frequency is appropriate based on operating experience and because significant changes in the boron concentration in the spent fuel pool are difficult to produce without detection, considering the large volume of water contained in the spent fuel pool. An analysis has concluded that a spent fuel pool boron dilution event of sufficient magnitude to reduce boron concentration below the minimum non-accident requirement is not credible (Ref. 4).

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REFERENCES

1. WCAP-14416-NP-A "Westinghouse Spent Fuel Rack Criticality Analysis Methodology," Rev. 1, dated November, 1996.
2. CAC-97-162 "Byron and Braidwood Spent Fuel Rack Criticality Analysis Using Soluble Boron Credit," dated May, 1997.
3. UFSAR, Section 15.7.4.
4. "Byron/Braidwood Spent Fuel Pool Dilution Analysis," Rev. 3, dated June 17, 1997.
5. Double contingency principle of ANSI N16.1 - 1975, as specified in the April 14, 1978 NRC letter (Section 1.2) and implied in the proposed revision to Regulatory Guide 1.13 (Section 1.4, Appendix A).
6. ANSI/ANS 8.1 - 1983 "American National Standard for Nuclear Criticality Safety in Operations with Fissionable Materials Outside Reactors."
7. Safety Evaluation Report (SER) dated October 25, 1996, issued by the Office of Nuclear Reactor Regulation for Topical Report WCAP-14416-NP-A "Westinghouse Spent Fuel Rack Criticality Analysis Methodology."

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BASES

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## B 3.7 PLANT SYSTEMS

### B 3.7.16 Spent Fuel Assembly Storage

#### BASES

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##### BACKGROUND

The spent fuel pool provides for storage of various Westinghouse Optimized Fuel Assembly (OFA) types of different initial fuel enrichments and exposure histories in two distinct regions. (For this discussion, the term OFA is intended to refer to the specific reduced fuel rodlet diameter, and includes all analyzed fuel types with this diameter, such as Vantage 5.) There are 23 separate racks which provide placement locations for a total of 2870 new or used fuel assemblies. Included in this are six specific storage locations in one of the racks for placement of failed fuel assemblies. These locations are identified as the failed fuel storage cells. Of the 23 racks, four are designate "Region 1" with the remaining 19 racks designated as "Region 2". The analytical methodology used to develop the criticality analyses has been reviewed and approved by the NRC (Ref. 1).

Region 1 racks contain 392 cells which are analyzed for storing Westinghouse OFAs in an "All Cells" arrangement (that is, the criticality analysis assumes that spent fuel assemblies reside in all available cell locations, with the exception of the boundary requirements). The stored fuel assemblies may contain an initial nominal enrichment of  $\leq 4.7$  weight percent U-235 (without Integral Fuel Burnable Absorbers (IFBAs) installed) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, provided that the requirement for a minimum number of 16 IFBAs is met (Ref. 2). The IFBAs are required to have, as a minimum, a boron loading of 1.0X, equal to an amount of 1.5 mg B<sup>10</sup>/inch. This is the minimum standard poison material loading offered by Westinghouse for 17X17 OFAs.

Region 2 racks contain 2472 cells which are also analyzed for storing Westinghouse OFAs in a combination of storage configurations. These patterns are:

- 1) "All Cells" Storage;
- 2) "3-out-of-4 Checkerboard" Storage; and
- 3) "2-out-of-4 Checkerboard" Storage.

## BASES

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### BACKGROUND (continued)

For the "All Cells" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 1.14$  weight percent U-235 (without taking credit for fuel burnup or radioactive decay of fuel constituents) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup and radioactive decay of fuel constituents are credited.

For the "3-out-of-4 Checkerboard" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 1.64$  weight percent U-235 (without taking credit for fuel burnup or radioactive decay of fuel constituents) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup and radioactive decay of fuel constituents are credited. In this storage pattern, there can be no more than three stored assemblies in any 2X2 matrix of cell lattices.

For the "2-out-of-4 Checkerboard" storage configuration, the stored fuel assemblies may contain an initial nominal enrichment of  $\leq 4.10$  weight percent U-235 (without taking credit for fuel burnup) up to an initial nominal enrichment of  $\leq 5.0$  weight percent U-235, when fuel burnup is credited. In this storage pattern, no two fuel assemblies may be stored "face adjacent" (that is, there must be an empty cell opposite each face of the fuel assembly).

The water in the spent fuel pool normally contains soluble boron which results in large subcriticality margins under actual operating conditions.

## BASES

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### APPLICABLE SAFETY ANALYSES

NRC approved methodologies were used to develop the criticality analyses (Ref. 1). The fuel handling accident analyses are provided in Reference 3. The accident analyses for criticality and spent fuel pool dilution are provided in References 2 and 4, respectively.

The criticality analyses for the spent fuel assembly storage racks confirm that  $k_{eff}$  remains  $< 1.0$  (including uncertainties and tolerances) at a 95% probability with a 95% confidence level (95/95 basis), based on the accident condition of the pool being flooded with unborated water. Thus, the design of both regions assumes the use of unborated water while maintaining stored fuel in a subcritical condition.

However, the presence of soluble boron has been credited to provide adequate safety margin to maintain spent fuel assembly storage rack  $k_{eff} \leq 0.95$  (also on a 95/95 basis) for all postulated accident scenarios involving dropped or misloaded fuel assemblies and loss of spent fuel pool temperature control. Crediting the presence of soluble boron for mitigation of these scenarios is acceptable based on applying the "double contingency principle" which states that there is no requirement to assume two unlikely, independent, concurrent events to ensure protection against a criticality accident (Refs. 5 and 6).

The accident analyses address the following five postulated scenarios:

- 1) fuel assembly drop on top of rack;
- 2) fuel assembly drop between rack modules;
- 3) fuel assembly drop between rack modules and spent fuel pool wall;
- 4) change in spent fuel pool water temperature; and
- 5) fuel assembly loaded contrary to placement restrictions.

Of these, only the last two have the capacity to increase reactivity beyond the analyzed condition.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

Calculations were performed to determine the reactivity change caused by a change in spent fuel pool water temperature outside the normal range (50 - 160°F). For the change in spent fuel pool water temperature accident, a temperature range of 32 - 240°F is considered. In all cases, additional reactivity margin is available to the 0.95  $k_{eff}$  limit to allow for temperature accidents. The temperature change accident can occur at any time during operation of the spent fuel pool.

For the fuel assembly misload accident, calculations were performed to show the largest reactivity increase caused by a Westinghouse 17X17 OFA fuel assembly misplaced into a storage cell for which the restrictions on location, enrichment, or burnup are not satisfied. The assembly misload accident can only occur during fuel handling operations in the spent fuel pool.

For the above postulated accident conditions, the double contingency principle can be applied. Specifically, the presence of soluble boron in the spent fuel pool water can be assumed as a realistic initial condition since not assuming its presence would be a second unlikely event. Spent fuel pool soluble boron has been credited in the criticality safety analysis to offset storage rack and fuel assembly tolerances, calculational uncertainties, uncertainty associated with burnup credit and the reactivity increase caused by postulated accident conditions.

Based on the above discussion, should a spent fuel pool water temperature change accident or a fuel assembly misload accident occur in the Region 1, Region 2, or failed fuel storage cells,  $k_{eff}$  will be maintained  $\leq$  to 0.95 due to the presence of at least 550 ppm (no fuel handling) or 1650 ppm (during fuel handling) of soluble boron in the spent fuel pool water.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

A spent fuel pool dilution analysis (Ref. 4) has been performed as required by Reference 7. The analysis assumes an initial boron concentration of 2000 ppm. The dilution analysis concludes that an unplanned or inadvertent event that would result in the dilution of the spent fuel pool boron concentration from 2000 ppm to 550 ppm (minimum non-accident boron concentration) is not credible.

Interface requirements have been established to ensure  $k_{eff}$  is maintained within the appropriate limits. There are interface requirements between Region 1 racks, between Region 1 and Region 2 racks, between Region 2 racks, and within racks between different checkerboard configurations. These requirements are necessary to account for unique geometries and configurations which exist at the interfaces. Interface requirements exist between adjacent racks to account for the potential reactivity increase in 3-out-of-4 and 2-out-of-4 storage configurations along the interface with non-aligned racks.

The configuration of fuel assemblies in the spent fuel pool satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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LCO

The restrictions on the placement of fuel assemblies within the spent fuel pool in accordance with the requirements in the accompanying LCO ensure that the  $k_{eff}$  of the spent fuel pool will always remain  $< 1.0$  assuming the pool is flooded with unborated water and  $\leq 0.95$  assuming the presence of 550 ppm soluble boron in the pool.

In LCO Figures 3.7.16-1 and 3.7.16-2, the Acceptable Burnup Domain lies on, above, and to the left of the decay time line applicable to the fuel assembly to be stored. The decay time for that assembly is measured from the time since the assembly was last discharged.

In LCO Figure 3.7.16-3, the Acceptable Burnup Domain and the Unacceptable Burnup Domain are separated by a single line because decay time is not credited in the 2-out-of-4 Checkerboard storage configuration. The Acceptable Burnup Domain lies on, above, and to the left of the line.



BASES

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LCO (continued)

In each figure, the use of linear interpolation between minimum burnups is acceptable.

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APPLICABILITY      This LCO applies whenever fuel assemblies are stored in the spent fuel pool.

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ACTIONS            The ACTIONS have been modified by a Note indicating that LCO 3.0.3 does not apply.

A.1

When the configuration of fuel assemblies stored in the spent fuel pool is not in accordance with the requirements of the LCO, immediate action must be taken to make the necessary fuel assembly movement(s) to bring the configuration into compliance.

If moving fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving fuel assemblies while in MODES 1, 2, 3, and 4, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of fuel assemblies is not sufficient reason to require a reactor shutdown.

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.16.1

SR 3.7.16.1 is performed prior to storing the fuel assembly in the intended spent fuel pool storage location. The frequency is appropriate because compliance with the SR ensures that the relationship between the fuel assembly and its storage location will meet the requirements of the LCO and preserve the assumptions of the analyses.

This SR verifies by administrative means that the initial nominal enrichment of the fuel assembly or a minimum number of 16 IFBAs is met to ensure that the assumptions of the safety analyses are preserved.

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BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.16.2

SR 3.7.16.2 is performed prior to storing the fuel assembly in the intended spent fuel pool storage location. The frequency is appropriate because compliance with the SR ensures that the relationship between the fuel assembly and its storage location will meet the requirements of the LCO and preserve the assumptions of the analyses.

This SR verifies by administrative means that the combination of initial enrichment, burnup, and decay time of the fuel assembly is within the Acceptable Burnup Domain of Figure 3.7.16-1, 3.7.16-2, or 3.7.16-3 for the intended storage configuration to ensure that the assumptions of the safety analyses are preserved.

SR 3.7.16.3

SR 3.7.16.3 is performed prior to storing the fuel assembly in the intended spent fuel pool storage location. The frequency is appropriate because compliance with the SR ensures that the relationship between the fuel assembly and its storage location will meet the requirements of the LCO and preserve the assumptions of the analyses.

This SR verifies by administrative means that the interface requirements (Ref. 2) within and between adjacent racks are met to ensure that the assumptions of the safety analyses are preserved.

BASES

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REFERENCES

1. WCAP-14416-NP-A "Westinghouse Spent Fuel Rack Criticality Analysis Methodology." Rev. 1. dated November, 1996.
2. CAC-97-162 "Byron and Braidwood Spent Fuel Rack Criticality Analysis Using Soluble Boron Credit," dated May, 1997.
3. UFSAR, Section 15.7.4.
4. "Byron/Braidwood Spent Fuel Pool Dilution Analysis." Rev. 3, dated June 17, 1997.
5. Double contingency principle of ANSI N16.1 - 1975, as specified in the April 14, 1978 NRC letter (Section 1.2) and implied in the proposed revision to Regulatory Guide 1.13 (Section 1.4, Appendix A).
6. ANSI/ANS 8.1 - 1983 "American National Standard for Nuclear Criticality Safety in Operations with Fissionable Materials Outside Reactors."
7. Safety Evaluation Report (SER) dated October 25, 1996, issued by the Office of Nuclear Reactor Regulation for Topical Report WCAP-14416-NP-A "Westinghouse Spent Fuel Rack Criticality Analysis Methodology."

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.1 AC Sources – Operating

#### BASES

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##### BACKGROUND

The unit Class 1E AC Electrical Power Distribution System AC sources consist of the offsite power sources and the onsite standby power sources (Train A and Train B Diesel Generators (DGs)). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the design of the AC electrical power system provides independence and redundancy to ensure an available source of power to the Engineered Safety Feature (ESF) systems.

The onsite Class 1E AC Distribution System is divided into redundant load groups (divisions) so that the loss of any one group does not prevent the minimum safety functions from being performed. Each division has connections to two offsite power sources and a single DG.

Offsite power is supplied to the station switchyard from the transmission network. From the switchyard, two electrically and physically separated lines (i.e., independent transmission circuits) provide AC power through their associated System Auxiliary Transformer (SAT) banks (SATs 142-1 and 142-2 from one line, and SATs 242-1 and 242-2 from the second line), to the 4.16 kV ESF buses. Normally, SATs 142-1 and 142-2 feed Unit 1 4.16 kV ESF buses, and SATs 242-1 and 242-2 feed Unit 2 4.16 kV ESF buses. Additionally, each 4.16 kV ESF bus has a reserve feed via its associated crosstie to an opposite-unit 4.16 kV ESF bus. Each unit is required to have qualified normal and reserve circuits to each 4.16 kV bus (detailed in the LCO Bases for this Specification). The transmission network and switchyard are maintained in accordance with UFSAR, and are not governed by the requirements of Technical Specifications. A detailed description of the offsite power network and the circuits to the Class 1E ESF buses is found in the UFSAR, Chapter 8 (Ref. 2).

## BASES

## BACKGROUND (continued)

The onsite standby power source for each 4.16 kV ESF bus is a dedicated DG. DGs 1A (2A) and 1B (2B) are dedicated to ESF buses 141 (241) and 142 (242), respectively. A DG starts automatically on a Safety Injection (SI) signal (i.e., manual SI, low steam line pressure, low pressurizer pressure or high-1 containment pressure signals) or on an ESF bus degraded voltage or undervoltage signal (refer to LCO 3.3.5, "Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation"). After the DG has started, it will automatically tie to its respective bus after offsite power is tripped as a consequence of ESF bus undervoltage or degraded voltage, independent of or coincident with an SI signal. The DGs will also start and operate in the standby mode without tying to the ESF bus on an SI signal alone. Following the trip of offsite power, an undervoltage signal strips nonpermanent loads from the ESF bus. When the DG is tied to the ESF bus, loads are then sequentially connected to its respective ESF bus by automatic load sequencing. The sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading the DG by automatic load application.

In the event of a loss of offsite power, the ESF electrical loads are automatically connected to the DGs in sufficient time to provide for safe reactor shutdown and to mitigate the consequences of a Design Basis Accident (DBA) such as a Loss Of Coolant Accident (LOCA).

Certain required unit loads are automatically connected to the DGs in a predetermined sequence in order to prevent overloading the DG in the process. Within 1 minute after the initiating signal is received, all loads needed to recover the unit or maintain it in a safe condition are automatically connected to the DGs.

Continuous service ratings for Train A and Train B DGs satisfy the requirements of Regulatory Guide 1.9 (Ref. 3). The continuous service rating of each DG is 5500 kW with 10% overload permissible for up to 2 hours in any 24 hour period. The ESF loads that are powered from the 4.16 kV ESF buses are listed in Reference 2.

## BASES

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### APPLICABLE SAFETY ANALYSES

The initial conditions of DBA and transient analyses in the UFSAR, Chapter 6 (Ref. 4) and Chapter 15 (Ref. 5), assume ESF systems are OPERABLE. The AC electrical power sources are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System (RCS), and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.4, Reactor Coolant System (RCS); and Section 3.6, Containment Systems.

The OPERABILITY of the AC electrical power sources is consistent with the initial assumptions of the Accident analyses and is based upon meeting the design basis of the plant. This results in maintaining at least one division of the onsite or offsite AC sources OPERABLE during Accident conditions in the event of:

- a. An assumed loss of all offsite power or all onsite AC power sources; and
- b. A worst case single failure.

The AC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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### LCO

Two qualified circuits per 4.16 kV bus between the offsite transmission network and the onsite Class 1E Electrical Power System and separate and independent DGs for each division ensure availability of the required power to shut down the reactor and maintain it in a safe shutdown condition after an Anticipated Operational Occurrence (AOO) or a postulated DBA.

Qualified circuits are those that are described in the UFSAR and are part of the licensing basis for the plant.

Each qualified circuit must be capable of maintaining rated frequency and voltage, and accepting required loads during an accident, while connected to the ESF buses.

BASES

LCO (continued)

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For Unit 1 (Unit 2), the two qualified circuits (a normal circuit and a reserve circuit) per ESF bus between the offsite transmission network and the onsite 4.16 kV ESF buses are as follows:

a. NORMAL

ESF bus 141 (241) 345 kV system through system auxiliary transformer (SAT) 142-1 (242-1) or by use of disconnect links via SAT 142-2 (242-2); and

ESF bus 142 (242) 345 kV system through SAT 142-2 (242-2) or by use of disconnect links via SAT 142-1 (242-1); and

b. RESERVE

ESF bus 141 (241) 345 kV system through SAT 242-1 (142-1) or by use of disconnect links via SAT 242-2 (142-2), to 4.16 kV ESF bus 241 (141) crosstied to 4.16 kV ESF bus 141 (241); and

ESF bus 142 (242) 345 kV system through SAT 242-2 (142-2) or by use of disconnect links via SAT 242-1 (142-1), to 4.16 kV ESF bus 242 (142) crosstied to 4.16 kV ESF bus 142 (242).

A standby (onsite) source to the 4.16 kV ESF buses is provided by DG 1A (2A) for 4.16 kV ESF bus 141 (241) and DG 1B (2B) for 4.16 kV ESF bus 142 (242).

BASES

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LCO (continued)

Each DG must be capable of starting, accelerating to rated speed and voltage, and connecting to its respective ESF bus on detection of bus undervoltage. This will be accomplished within 10 seconds. Each DG must also be capable of accepting required loads within the assumed loading sequence intervals, and continue to operate until offsite power can be restored to the ESF buses. These capabilities are required to be met from a variety of initial conditions such as DG engine hot and DG engine at ambient conditions. Additional DG capabilities must be demonstrated to meet required Surveillances (e.g., capability of the DG to revert to standby status on an Emergency Core Cooling System (ECCS) signal while operating in parallel test mode).

Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.

The AC sources in one division must be separate and independent (to the extent possible) of the AC sources in the other division. For the DGs, separation and independence are complete. For the qualified circuits, separation and independence are to the extent practical.

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APPLICABILITY

The AC sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

The AC power requirements for MODES 5 and 6 are covered in LCO 3.8.2, "AC Sources – Shutdown."



BASES

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ACTIONS

A.1

To ensure a highly reliable power source remains with one required qualified circuit inoperable, it is necessary to verify the OPERABILITY of the remaining required qualified circuit on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action not met. However, if another required circuit fails SR 3.8.1.1, this qualified circuit is inoperable, and additional Conditions and Required Actions may be appropriate. If the additional inoperability results in a bus with two required qualified circuits inoperable Condition C is entered. If the additional inoperability results in the second bus with one required qualified circuit inoperable Condition A is still applicable.

A.2

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition A for a period that should not exceed 72 hours. With one or more buses with one required qualified circuit inoperable, the reliability of the offsite system is degraded, and the potential for a loss of offsite power is increased, with attendant potential for a challenge to the plant safety systems. In this Condition, however, the remaining OPERABLE required qualified circuits and DGs are adequate to supply electrical power to the onsite Class 1E Distribution System.

The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

## BASES

## ACTIONS (continued)

The second Completion Time for Required Action A.2 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DG is inoperable and that DG is subsequently returned OPERABLE, the LCO may already have been not met for up to 72 hours. This could lead to a total of 144 hours, since initial failure to meet the LCO, to restore the required qualified circuit(s). At this time, a DG could again become inoperable, the circuit(s) restored OPERABLE, and an additional 72 hours (for a total of 9 days) allowed prior to complete restoration of the LCO. The 6 day Completion Time provides a limit on the time allowed in a 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 the 72 hour and 6 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

The Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time that the LCO was initially not met, instead of at the time Condition A was entered.

B.1

To ensure a highly reliable power source remains with an inoperable DG, it is necessary to verify the availability of the required qualified circuits on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in a Required Action being not met. However, if a required qualified circuit fails to pass SR 3.8.1.1, it is inoperable, and additional Conditions and Required Actions apply.

BASES

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ACTIONS (continued)

B.2

Required Action B.2 is intended to provide assurance that a loss of offsite power, during the period that a DG is inoperable, does not result in a complete loss of safety function of critical systems. These features (i.e., systems, subsystems, trains, components, and devices) are designed with redundant safety related trains. This includes the diesel driven auxiliary feedwater pump. Redundant required feature failures consist of inoperable features associated with a train, redundant to the train that has an inoperable DG.

The Completion Time for Required Action B.2 is intended to allow the operator time to evaluate and repair any discovered inoperabilities. This Completion Time also allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." In this Required Action, the Completion Time only begins on discovery that both:

- a. An inoperable DG exists; and
- b. A required feature on the other division is inoperable.

If at any time during the existence of this Condition (one DG inoperable) a required feature subsequently becomes inoperable, this Completion Time would begin to be tracked.

Discovering one required DG inoperable coincident with one or more inoperable required redundant feature(s) results in starting the Completion Time for the Required Action. Four hours from the discovery of these events existing concurrently is acceptable because it minimizes risk while allowing time for restoration before subjecting the unit to transients associated with shutdown.

## BASES

## ACTIONS (continued)

In this Condition, the remaining OPERABLE DG and qualified circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. Thus, on a component basis, single failure protection for the required feature's function may have been lost; however, function has not been lost. The 4 hour Completion Time takes into account the OPERABILITY of the redundant counterpart to the inoperable required feature. Additionally, the 4 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

B.3.1 and B.3.2

Required Action B.3.1 provides an allowance to avoid unnecessary testing of OPERABLE DG(s). If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR 3.8.1.2 does not have to be performed. If the cause of inoperability exists on the other DG, the other DG would be declared inoperable upon discovery and Condition E of LCO 3.8.1 would be entered. Once the failure is repaired, the common cause failure no longer exists, and Required Action B.3.1 is satisfied. If the cause of the initial inoperable DG cannot be confirmed not to exist on the remaining DG, performance of SR 3.8.1.2 suffices to provide assurance of continued OPERABILITY of that DG.

In the event the inoperable DG is restored to OPERABLE status prior to completing either B.3.1 or B.3.2, the Problem Identification and Investigation Procedure will continue to evaluate the common cause possibility and determine the need for any additional DG testing. This continued evaluation, however, is no longer under the 24 hour constraint imposed while in Condition B.

According to Generic Letter 84-15 (Ref. 7), 24 hours is reasonable to confirm that the OPERABLE DG is not affected by the same problem as the inoperable DG.

BASES

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ACTIONS (continued)

B.4

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition B for a period that should not exceed 72 hours.

In Condition B, the remaining OPERABLE DG and required qualified circuits are adequate to supply electrical power to the onsite Class 1E Distribution System. The 72 hour Completion Time takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

The second Completion Time for Required Action B.4 establishes a limit on the maximum time allowed for any combination of required AC power sources to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, a required qualified circuit is inoperable and that circuit is subsequently restored OPERABLE, the LCO may already have been not met for up to 72 hours. This could lead to a total of 144 hours, since initial failure to meet the LCO, to restore the DG. At this time, a required qualified circuit could again become inoperable, the DG restored OPERABLE, and an additional 72 hours (for a total of 9 days) allowed prior to complete restoration of the LCO. The 6 day Completion Time provides a limit on time allowed in a 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 the 72 hour and 6 day Completion Times means that both Completion Times apply simultaneously, and the more restrictive Completion Time must be met.

As in Required Action B.2, the Completion Time allows for an exception to the normal "time zero" for beginning the allowed time "clock." This will result in establishing the "time zero" at the time that the LCO was initially not met, instead of at the time Condition B was entered.

BASES

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ACTIONS (continued)

C.1

With one or more buses with both of its required qualified circuits inoperable, sufficient onsite AC sources are available to maintain the unit in a safe shutdown condition in the event of a DBA or transient. In fact, a simultaneous loss of offsite AC sources, a LOCA, and a worst case single failure were postulated as a part of the design basis in the safety analysis. Thus, the 24 hour Completion Time provides a period of time to effect restoration of one of the required qualified circuits commensurate with the importance of maintaining an AC electrical power system capable of meeting its design criteria.

According to Regulatory Guide 1.93 (Ref. 6), with the available required qualified circuits two less than required by the LCO, operation may continue for 24 hours. If two required qualified circuits are restored within 24 hours, unrestricted operation may continue. If only one required qualified circuit is restored within 24 hours, power operation continues in accordance with Condition A.

D.1 and D.2

In Condition D, with one DG inoperable and one or more buses with one qualified circuit inoperable or with one DG and one bus with both qualified circuits inoperable, individual redundancy is lost in both the offsite electrical power system and the onsite AC electrical power system. Since power system redundancy is provided by two diverse sources of power, however, the reliability of the power systems in this Condition may appear higher than that in Condition C. This difference in reliability is offset by the susceptibility of this power system configuration to a single bus or switching failure. The 12 hour Completion Time to restore the DG or the required qualified circuit(s) takes into account the capacity and capability of the remaining AC sources, a reasonable time for repairs, and the low probability of a DBA occurring during this period.

BASES

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ACTIONS (continued)

Pursuant to LCO 3.0.6, the Distribution System ACTIONS would not be entered even if all AC sources to it were inoperable, resulting in de-energization. Therefore, the Required Actions of Condition D are modified by a Note to indicate that when Condition D is entered with no AC source to any division (one or more divisions de-energized), the Conditions and Required Actions for LCO 3.8.9, "Distribution Systems – Operating," must be immediately entered. This allows Condition D to provide requirements for the loss of one DG and one required qualified circuit on one or more buses, without regard to whether a division is de-energized. LCO 3.8.9 provides the appropriate restrictions for a de-energized division.

According to Regulatory Guide 1.93 (Ref. 6), operation may continue in Condition D for a period that should not exceed 12 hours.

E.1

With Train A and Train B DGs inoperable, there are no remaining standby AC sources. Thus, with an assumed loss of offsite electrical power, insufficient standby AC sources are available to power the minimum required ESF functions. Since the offsite electrical power system is the only source of AC power for this level of degradation, the risk associated with continued operation for a very short time could be less than that associated with an immediate controlled shutdown (the immediate shutdown could cause grid instability, which could result in a total loss of AC power). Since any inadvertent generator trip could also result in a total loss of offsite AC power, the time allowed for continued operation is severely restricted. The intent here is to avoid the risk associated with an immediate controlled shutdown and to minimize the risk associated with this level of degradation.

According to Reference 6, with both DGs inoperable, operation may continue for a period that should not exceed 2 hours.

BASES

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ACTIONS (continued)

F.1 and F.2

If the inoperable AC electric power sources cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

G.1

Condition G corresponds to a level of degradation in which all redundancy in the AC electrical power supplies may be lost. At this severely degraded level, any further losses in the AC electrical power system may cause a loss of function. Therefore, no additional time is justified for continued operation. The unit is required by LCO 3.0.3 to commence a controlled shutdown. Examples of inoperabilities that require entry into Condition G are: 1) both DGs inoperable and both qualified circuits inoperable on one bus, and 2) one DG inoperable and both qualified circuits inoperable on one bus and one qualified circuit inoperable on the second bus.



## BASES

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### SURVEILLANCE REQUIREMENTS

The AC sources are designed to permit inspection and testing of all important areas and features, especially those that have a standby function, in accordance with 10 CFR 50, Appendix A, GDC 18 (Ref. 8). Periodic component tests are supplemented by extensive functional tests during refueling outages (under simulated accident conditions). The SRs for demonstrating the OPERABILITY of the DGs are in general conformance with the recommendations of Regulatory Guide 1.9 (Ref. 3), and Regulatory Guide 1.137 (Ref. 10), as addressed in the UFSAR.

Where the SRs discussed herein specify voltage and frequency tolerances, the following is applicable. The minimum steady state output voltage of 3950 V is 95% of the nominal 4160 V output voltage. This value allows for voltage drop to the terminals of 4000 V motors whose minimum operating voltage is specified as 90% or 3600 V. It also allows for voltage drops to motors and other equipment down through the 120 V level where minimum operating voltage is also usually specified as 90% of name plate rating. The specified maximum steady state output voltage of 4580 V is equal to the maximum operating voltage specified for 4000 V motors. It ensures that for a lightly loaded distribution system, the voltage at the terminals of 4000 V motors is no more than the maximum rated operating voltages. The specified minimum and maximum frequencies of the DG are 58.8 Hz and 61.2 Hz, respectively. These values are equal to  $\pm 2\%$  of the 60 Hz nominal frequency and are derived from the recommendations given in Regulatory Guide 1.9 (Ref. 3).

#### SR 3.8.1.1

This SR ensures proper circuit continuity for the offsite AC electrical power supply to the onsite distribution network and availability of offsite AC electrical power. The breaker alignment verifies that each breaker is in its correct position to ensure that distribution buses and loads are connected to their preferred power source, and that appropriate independence of offsite circuits is maintained. The 7 day Frequency is adequate since breaker position is not likely to change without the operator being aware of it and because its status is displayed in the control room.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.2 and SR 3.8.1.7

These SRs help to ensure the availability of the standby electrical power supply to mitigate DBAs and transients and to maintain the unit in a safe shutdown condition.

Each SR 3.8.1.2 and SR 3.8.1.7 DG start requires the DG to achieve and maintain a steady state voltage and frequency range. The start signals used for this test may consist of one of the following signals:

- a. Manual;
- b. Simulated loss of ESF bus voltage by itself;
- c. Simulated loss of ESF bus voltage in conjunction with an ESF actuation test signal; or
- d. An ESF actuation test signal by itself.

For the purpose of SR 3.8.1.2 testing, the DGs are started from standby conditions once per 31 days. Standby conditions for a DG mean that the diesel engine coolant and oil are being continuously circulated and temperature is being maintained consistent with manufacturer's recommended operating range (low lube oil and jacket water temperature alarm settings to the high lube oil and jacket water temperature alarm settings).

For the purposes of SR 3.8.1.7 testing, the DGs are started from normal standby conditions once per 184 days. Normal standby conditions for a DG mean that the diesel engine coolant and oil are being continuously circulated and temperature is being maintained within the prescribed temperature bands of these subsystems when the diesel generator has been at rest for an extended period of time with the prelube oil and jacket water circulating systems operational. The prescribed temperature band is 115°F – 135°F which accounts for instrument tolerances. DG starts for these Surveillances are followed by a warmup period prior to loading.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

In order to reduce stress and wear on diesel engines, a modified start is used in which the starting speed of DGs is limited, warmup is limited to this lower speed, and the DGs are gradually accelerated to synchronous speed prior to loading. These start procedures are the intent of starts in accordance with SR 3.8.1.2.

SR 3.8.1.7 requires that, at a 184 day Frequency, the DG starts from normal standby conditions and achieves required voltage and frequency within 10 seconds. The 10 second start requirement supports the assumptions of the design basis LOCA analysis in the UFSAR, Chapter 15 (Ref. 5).

The 10 second start requirement is not applicable to SR 3.8.1.2 (see SR Note) when a modified start procedure as described above is used. If a modified start is not used, the 10 second start requirement of SR 3.8.1.7 applies.

Since SR 3.8.1.7 requires a 10 second start, it is more restrictive than SR 3.8.1.2, and it may be performed in lieu of SR 3.8.1.2. This is also addressed in SR 3.8.1.2 Note.

The 31 day Frequency for SR 3.8.1.2 is consistent with Regulatory Guide 1.9 (Ref. 3). The 184 day Frequency for SR 3.8.1.7 is a reduction in cold testing consistent with Generic Letter 84-15 (Ref. 7). These Frequencies provide adequate assurance of DG OPERABILITY, while minimizing degradation resulting from testing.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.3

This Surveillance verifies that the DGs are capable of synchronizing with the offsite electrical system and accepting loads greater than or equal to the equivalent of the maximum expected accident loads. A minimum run time of 60 minutes is required to stabilize engine temperatures.

Although no power factor requirements are established by this SR, the DG is normally operated between 0 and 1000 kVARs. The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

The 31 day Frequency for this Surveillance is consistent with Regulatory Guide 1.9 (Ref. 3).

This SR is modified by four Notes. Note 1 indicates that diesel engine runs for this Surveillance may include gradual loading, as recommended by the manufacturer, so that mechanical stress and wear on the diesel engine are minimized. Note 2 states that momentary transients (e.g., changing bus loads) do not invalidate this test. Similarly, momentary kVAR transients outside of the specified range do not invalidate the test. Note 3 indicates that this Surveillance should be conducted on only one DG at a time in order to avoid common cause failures that might result from offsite circuit or grid perturbations. Note 4 stipulates a prerequisite requirement for performance of this SR. A successful DG start must precede this test to credit satisfactory performance.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.4

This SR provides verification that the level of fuel oil in the day tank is at or above the level at which fuel oil is automatically added. The level is expressed as an equivalent volume in gallons, and is selected to ensure adequate fuel oil for a minimum of 1 hour of DG operation at full load plus 10%.

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

SR 3.8.1.5

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 oil day 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, contaminated fuel oil, and 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. 10). This SR is for preventative maintenance. The presence of water does not necessarily represent failure of this SR, provided the accumulated water is removed during the performance of this Surveillance.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.6

This Surveillance demonstrates that each required (one of two transfer pumps per DG is "required" to support DG OPERABILITY) fuel oil transfer pump operates and transfers fuel oil from its associated storage tank(s) to its associated day tank. This is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

The design of fuel transfer systems is such that one pump will operate automatically in order to maintain an adequate volume of fuel oil in the day tank during or following DG testing. Therefore, a 31 day Frequency is appropriate.

SR 3.8.1.8

Transfer of each 4.16 kV ESF bus power supply from the normal offsite circuit to the alternate offsite circuit demonstrates the OPERABILITY of the alternate circuit distribution network to power the shutdown loads. The 18 month Frequency of the Surveillance is based on engineering judgment, taking into consideration the unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.9

Each DG is provided with an engine overspeed trip to prevent damage to the engine. Recovery from the transient caused by the loss of a large load could cause diesel engine overspeed, which, if excessive, might result in a trip of the engine. This Surveillance demonstrates the DG load response characteristics and capability to reject the largest single load without exceeding predetermined voltage and frequency and while maintaining a specified margin to the overspeed trip. The single largest post-accident load associated with each DG is the Essential Service Water (SX) pump (1290 brake horsepower, 1034 kW at full load conditions). This Surveillance is accomplished by simultaneously tripping loads supplied by the DG which have a minimum combined load equivalent to the single largest post-accident load. This method is employed due to the difficulty of attaining SX full load conditions during normal plant operations.

As required by IEEE-308 (Ref. 9), the load rejection test is acceptable if the increase in diesel speed does not exceed 75% of the difference between synchronous speed and the overspeed trip setpoint (64.5 Hz), or 15% above synchronous speed (69 Hz), whichever is lower.

The voltage and frequency tolerances specified in this SR are derived from Regulatory Guide 1.9 (Ref. 3) recommendations for response during load sequence intervals. The voltage and frequency specified are consistent with the design range of the equipment powered by the DG. SR 3.8.1.9.a corresponds to the maximum frequency excursion, while SR 3.8.1.9.b and SR 3.8.1.9.c are steady state voltage and frequency values to which the system must recover following load rejection. The 18 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3).

This SR is modified by a Note. The reason for the Note is that during operation with the reactor critical, performance of this SR could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.10

This Surveillance demonstrates the DG capability to reject a full load without overspeed tripping or exceeding the predetermined voltage limits. The DG full load rejection may occur because of a system fault or inadvertent breaker tripping. This Surveillance ensures proper engine/generator response under the simulated test conditions. This test simulates a full load rejection and verifies that the DG does not trip upon loss of the load. These acceptance criteria provide for DG damage protection. While the DG is not expected to experience this transient during an event and continues to be available, this response ensures that the DG is not degraded for future application, including reconnection to the bus if the trip initiator can be corrected or isolated.

The 18 month Frequency is consistent with the recommendation of Regulatory Guide 1.9 (Ref. 3) and is intended to be consistent with expected fuel cycle lengths.

This SR has been modified by two Notes. Note 1 states that momentary transients above the stated voltage limit immediately following a load rejection (i.e., the DG full load rejection) do not invalidate this test. The momentary transient is that which occurs immediately after the circuit breaker is opened, lasts a few milliseconds, and may or may not be observed on voltage recording or monitoring instrumentation. The reason for Note 2 is that during operation with the reactor critical, performance of this SR could cause perturbation to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.11

In general conformance with the recommendations of Regulatory Guide 1.9 (Ref. 3), paragraph 2.2.4, this Surveillance demonstrates the as designed operation of the standby power sources during loss of the offsite source. This test verifies all actions encountered from the loss of offsite power, including shedding of the nonessential loads and energization of the emergency buses and respective loads from the DG. It further demonstrates the capability of the DG to automatically achieve the required voltage and frequency within the specified time, and maintain a steady state voltage and frequency range.

The DG autostart time of 10 seconds is derived from requirements of the accident analysis to respond to a design basis large break LOCA. The Surveillance should be continued for a minimum of 5 minutes in order to demonstrate that all starting transients have decayed and stability is achieved.

The requirement to verify the connection and power supply of permanent and autoconnected loads is intended to satisfactorily show the relationship of these loads to the DG loading logic. In certain circumstances, many of these loads cannot actually be connected or loaded without undue hardship or potential for undesired operation. For instance, ECCS injection valves are not desired to be stroked open, or high pressure injection systems are not capable of being operated at full flow, or Residual Heat Removal (RHR) systems performing a decay heat removal function are not desired to be realigned to the ECCS mode of operation. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG systems to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.

SR 3.8.1.12

This Surveillance demonstrates that the DG automatically starts and achieves the required voltage and frequency within the specified time (10 seconds) from the design basis actuation signal (LOCA signal) and operates for  $\geq 5$  minutes. The 5 minute period provides sufficient time to demonstrate stability.

The Frequency of 18 months takes into consideration unit conditions required to perform the Surveillance and is intended to be consistent with the expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.13

This Surveillance demonstrates that DG noncritical protective functions (e.g., high jacket water temperature) are bypassed on a loss of voltage signal concurrent with an ESF actuation test signal. The noncritical trips are bypassed during DBAs and provide an alarm on an abnormal engine condition. This alarm provides the operator with sufficient time to react appropriately. The DG availability to mitigate the DBA is more critical than protecting the engine against minor problems that are not immediately detrimental to emergency operation of the DG.

The 18 month Frequency is based on engineering judgment, taking into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths. Operating experience has shown that these components usually pass the SR when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.14

Regulatory Guide 1.9 (Ref. 3), paragraph 2.2.9, recommends demonstration once per 18 months that the DGs can start and run continuously at full load capability for an interval of not less than 24 hours,  $\geq 2$  hours of which is at a load band equivalent to 105% to 110% of the continuous duty rating and the remainder of the time at a load equivalent to the continuous duty rating of the DG. The DG starts for this Surveillance can be performed either from standby or hot conditions. The provisions for warmup, discussed in SR 3.8.1.2, and for gradual loading, discussed in SR 3.8.1.3, are also applicable to this SR.

Although no power factor requirements are established by this SR, a portion of the testing is performed between 0 and 1000 kVARs. The practice of performing this entire test at rated power factor has been determined to be unjustified, potentially destructive, testing due to exceeding the vendors recommendation for maximum voltage of the generator if the DG output breaker should open during testing. Therefore, the DG is to be operated at rated power factor for only a short duration during the performance of this surveillance in accordance with the following guidance:

During the period that the DG is loaded at  $\geq 5500$  kW and  $\leq 1000$  kVAR, the following shall be performed once to verify DG operability at rated power factor:

- a. Over a two minute period, raise kVAR loading to 4125 kVAR;
- b. Operate the DG at 4125 kVAR for 1 minute or until kVAR and kW loading has stabilized; and
- c. Reduce kVAR loading to  $\leq 1000$  kVAR.

The load band is provided to avoid routine overloading of the DG. Routine overloading may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This Surveillance is modified by two Notes. Note 1 states that momentary transients (e.g., due to changing bus loads) do not invalidate this test. The reason for Note 2 is that during operation with the reactor critical, performance of this Surveillance could cause perturbations to the electrical distribution systems that could challenge continued steady state operation and, as a result, plant safety systems.

SR 3.8.1.15

This Surveillance demonstrates that the diesel engine can restart from a hot condition, such as subsequent to shutdown from normal Surveillances, and achieve the required voltage and frequency within 10 seconds. The 10 second time is derived from the requirements of the accident analysis to respond to a design basis large break LOCA. The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3).

This SR is modified by two Notes. Note 1 ensures that the test is performed with the diesel sufficiently hot. The load band is provided to avoid routine overloading of the DG. Routine overloads may result in more frequent teardown inspections in accordance with vendor recommendations in order to maintain DG OPERABILITY. The requirement that the diesel has operated for at least 2 hours at full load conditions prior to performance of this Surveillance is based on manufacturer recommendations for achieving hot conditions. Alternatively, the DG can be operated until operating temperatures have stabilized. Note 2 states that momentary transients (e.g., due to changing bus loads) do not invalidate this test.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.16

As required by Regulatory Guide 1.9 (Ref. 3), paragraph 2.2.11, this Surveillance ensures that the manual synchronization and load transfer from the DG to the offsite source can be made and the DG can be returned to ready to load status when offsite power is restored. It also ensures that the autostart logic is reset to allow the DG to reload if a subsequent loss of offsite power occurs. The DG is considered to be in ready to load status when the DG is at rated speed and voltage, the output breaker is open and can receive an autoclose signal on bus undervoltage, and the load sequence timers are reset.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), and takes into consideration unit conditions required to perform the Surveillance.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.17

Demonstration of the test mode override ensures that the DG availability under accident conditions will not be compromised as the result of testing and the DG will automatically reset to ready to load operation if a LOCA actuation signal is received during operation in the test mode. Ready to load operation is defined as the DG running at rated speed and voltage with the DG output breaker open. These provisions for automatic switchover are required by IEEE-308 (Ref. 9), paragraph 6.2.6(2).

The intent in the requirement associated with SR 3.8.1.17.b is to show that the emergency loading was not affected by the DG operation in test mode. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the emergency loads to perform these functions is acceptable.

This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The 18 month Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.18

Under accident and loss of offsite power conditions, loads are sequentially connected to the bus by the automatic load sequence timers. The sequencing logic controls the permissive and starting signals to motor breakers to prevent overloading of the DGs due to high motor starting currents. The 10% load sequence time interval tolerance ensures that sufficient time exists for the DG to restore frequency and voltage prior to applying the next load and that safety analysis assumptions regarding ESF equipment time delays are not violated. Reference 2 provides a summary of the automatic loading of ESF buses.

The Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3), takes into consideration unit conditions required to perform the Surveillance, and is intended to be consistent with expected fuel cycle lengths.

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.1.19

In the event of a DBA coincident with a loss of offsite power, the DGs are required to supply the necessary power to ESF systems so that the fuel, RCS, and containment design limits are not exceeded.

This Surveillance demonstrates the DG operation, as discussed in the Bases for SR 3.8.1.11, during a loss of offsite power actuation test signal in conjunction with an ESF actuation signal. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the DG system to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified.

The Frequency of 18 months takes into consideration unit conditions required to perform the Surveillance and is intended to be consistent with an expected fuel cycle length of 18 months.

This SR is modified by a Note. The reason for the Note is that the performance of the Surveillance would remove a required offsite circuit from service, perturb the electrical distribution system, and challenge safety systems.

SR 3.8.1.20

This Surveillance demonstrates that the DG starting independence has not been compromised. Also, this Surveillance demonstrates that each engine can achieve proper speed within the specified time when the DGs are started simultaneously.

The 10 year Frequency is consistent with the recommendations of Regulatory Guide 1.9 (Ref. 3).

BASES

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 17.
2. UFSAR, Chapter 8.
3. Regulatory Guide 1.9, Rev. 3, July 1993.
4. UFSAR, Chapter 6.
5. UFSAR, Chapter 15.
6. Regulatory Guide 1.93, Rev. 0, December 1974.
7. Generic Letter 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," July 2, 1984.
8. 10 CFR 50, Appendix A, GDC 18.
9. IEEE Standard 308-1978.
10. Regulatory Guide 1.137, Rev. 1, October 1979.

BASES

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B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.2 AC Sources - Shutdown

BASES

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BACKGROUND            A description of the AC sources is provided in the Bases for LCO 3.8.1, "AC Sources - Operating."

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APPLICABLE  
SAFETY ANALYSES        The OPERABILITY of the minimum AC sources during MODES 5 and 6, and during movement of irradiated fuel assemblies ensures that:

- a.    The unit can be maintained in the shutdown or refueling condition for extended periods;
- b.    Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c.    Adequate AC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.

In general, when the unit is shut down, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1, 2, 3, and 4 have no specific analyses in MODES 5 and 6. Worst case bounding events are deemed not credible in MODES 5 and 6 because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and in minimal consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

BASES

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APPLICABLE SAFETY ANALYSES (continued)

During MODES 1, 2, 3, and 4, various deviations from the analysis assumptions and design requirements are allowed within the Required Actions. This allowance is in recognition that certain testing and maintenance activities must be conducted provided an acceptable level of risk is not exceeded. During MODES 5 and 6, performance of a significant number of required testing and maintenance activities is also required. In MODES 5 and 6, the activities are generally planned and administratively controlled. Relaxations from MODES 1, 2, 3, and 4 LCO requirements are acceptable during shutdown modes based on:

- a. The fact that time in an outage is limited. This is a risk prudent goal as well as a utility economic consideration;
- b. Requiring appropriate compensatory measures for certain conditions. These may include administrative controls, reliance on systems that do not necessarily meet typical design requirements applied to systems credited in operating MODE analyses, or both;
- c. Prudent utility consideration of the risk associated with multiple activities that could affect multiple systems; and
- d. Maintaining, to the extent practical, the ability to perform required functions (even if not meeting MODE 1, 2, 3, and 4 OPERABILITY requirements) with systems assumed to function during an event.

In the event of an accident during shutdown, this LCO ensures the capability to support systems necessary to avoid immediate difficulty, assuming either a loss of all offsite power or a loss of all onsite Diesel Generator (DG) power.

The AC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

One qualified circuit capable of supplying the onsite Class 1E power distribution subsystem(s) of LCO 3.8.10. "Distribution Systems – Shutdown," ensures that all required loads are capable of being powered from offsite power. An OPERABLE DG, associated with one of the distribution subsystem division(s) required to be OPERABLE by LCO 3.8.10, ensures a diverse power source is available to provide electrical power support, assuming a loss of the offsite circuit. Together, OPERABILITY of the required qualified circuit and DG ensures the availability of sufficient AC sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

The qualified circuit must be capable of maintaining rated frequency and voltage, and accepting required loads during an accident, while connected to the Engineered Safety Feature (ESF) bus(es). Qualified circuits are those that are described in the UFSAR and are part of the licensing basis for the plant. A description of the qualified circuits is contained in the Bases for LCO 3.8.1, "AC Sources – Operating."

The DG must be capable of starting, accelerating to rated speed and voltage, and connecting to its respective ESF bus on detection of bus undervoltage. This sequence must be accomplished within 10 seconds. The DG must be capable of accepting required loads within the assumed loading sequence intervals, and continue to operate until offsite power can be restored to the ESF buses. These capabilities are required to be met from a variety of initial conditions such as DG in normal standby with the engine hot and DG in standby at ambient conditions.

Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.

It is acceptable for divisions to be cross tied during shutdown conditions, allowing a single offsite power circuit to supply all required divisions.

## BASES

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### APPLICABILITY

The AC sources required to be OPERABLE in MODES 5 and 6, and at all times during movement of irradiated fuel assemblies, provide assurance that:

- a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core;
- b. Systems needed to mitigate a fuel handling accident are available;
- c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

The AC power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.1.

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### ACTIONS

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be sufficient reason to require a reactor shutdown.

BASES

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ACTIONS (continued)

A.1

The qualified circuit would be considered inoperable if it were not available to one required ESF division. Since two divisions may be required by LCO 3.8.10, the one division with offsite power available may be capable of supporting sufficient required features (i.e., systems, subsystems, trains, components, and devices) to allow continuation of CORE ALTERATIONS and fuel movement. By the allowance of the option to declare required features inoperable, with no offsite power available, appropriate restrictions will be implemented in accordance with the affected required features LCO's ACTIONS.



BASES

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ACTIONS (continued)

A.2.1, A.2.2, A.2.3, A.2.4, A.2.5, B.1, B.2, B.3, B.4, and B.5

With the offsite circuit not available to one or more required divisions, the option would still exist to declare all required features inoperable. Since this option may involve undesired administrative efforts, the allowance for sufficiently conservative actions is made. With the required DG inoperable, the minimum required diversity of AC power sources is not available. It is, therefore, required to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, operations involving positive reactivity additions, and declare the affected Low Temperature Overpressure Protection (LTOP) features required by LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System" inoperable. The Required Action to declare the affected LTOP features inoperable allows the operator to evaluate the current unit conditions and to determine which (if any) of the LTOP features have been affected by the loss of power. The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory provided the required SDM is maintained. Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in order to provide the necessary AC power to the plant safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

BASES

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ACTIONS (continued)

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS would not be entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a division is de-energized. LCO 3.8.10 would provide the appropriate restrictions for the situation involving a de-energized division.

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.8 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.17 is not required to be met because the required OPERABLE DG is not required to undergo periods of being synchronized to the offsite circuit. SR 3.8.1.20 is not required to be met because starting independence is not required with the DG that is not required to be operable.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DG from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to preclude de-energizing a required 4160 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR.

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REFERENCES

None.

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BASES

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## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.3 Diesel Fuel Oil

#### BASES

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##### BACKGROUND

Each Diesel Generator (DG) is provided with fuel oil capacity sufficient to operate that diesel for a period of 7 days while the DG is supplying maximum post loss of coolant accident load demand discussed in the UFSAR, Section 9.5.4.2 (Ref. 1). The station fuel oil system is comprised of two outside storage tanks (one 50,000 gal and one 125,000 gal) which are the source for all of the fuel oil needs for the station. These outside tanks are normally the source of "new" fuel oil. Each Unit 1 DG is provided with two 25,000 gallon inside storage tanks. Each Unit 2 DG is provided with one 50,000 gallon inside storage tank. These inside storage tanks are the source of the required "stored" fuel oil. This onsite fuel oil capacity is sufficient to operate the DGs for longer than the time to replenish the onsite supply from outside sources.

Fuel oil is transferred from the inside storage tank(s) to the day tank by either of two transfer pumps associated with each DG. Independence of pumps and piping precludes the failure of one pump, or the rupture of any pipe, valve or tank(s) to result in the loss of more than one DG.

For proper operation of the standby DGs, it is necessary to ensure the proper quality of the fuel oil. Regulatory Guide 1.137 (Ref. 2) addresses the recommended fuel oil practices as supplemented by ANSI N195 (Ref. 3). The fuel oil properties governed by these SRs are the water and sediment content, the kinematic viscosity, specific gravity (or API gravity), and particulate level.

## BASES

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### APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 4), and in the UFSAR, Chapter 15 (Ref. 5), assume Engineered Safety Feature (ESF) systems are OPERABLE. The DGs are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that fuel, Reactor Coolant System and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.4, Reactor Coolant System (RCS); and Section 3.6, Containment Systems.

Since the diesel fuel oil supports the operation of the standby AC power sources, they satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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### LCO

Stored diesel fuel oil is required to have sufficient supply for 7 days of maximum post accident load operation. It is also required to meet specific standards for quality. This requirement, in conjunction with an ability to obtain replacement supplies within 7 days, supports the availability of DGs required to shut down the reactor and to maintain it in a safe condition for an Anticipated Operational Occurrence (AOO) or a postulated DBA with loss of offsite power. DG day tank fuel requirements, as well as transfer capability from the storage tank to the day tank, are addressed in LCO 3.8.1, "AC Sources - Operating," and LCO 3.8.2, "AC Sources - Shutdown."

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### APPLICABILITY

The AC sources (LCO 3.8.1 and LCO 3.8.2) are required to ensure the availability of the required power to shut down the reactor and maintain it in a safe shutdown condition after an AOO or a postulated DBA. Since the stored diesel fuel oil supports LCO 3.8.1 and LCO 3.8.2, stored diesel fuel oil is required to be within limits when the associated DG is required to be OPERABLE.

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## BASES

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### ACTIONS

The ACTIONS Table is modified by a Note indicating that separate Condition entry is allowed for each DG. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each DG Fuel Oil System. Complying with the Required Actions for one inoperable DG Fuel Oil System may allow for continued operation, and subsequent inoperable DG Fuel Oil System(s) are governed by separate Condition entry and application of associated Required Actions.

#### A.1

In this Condition, the 7 day fuel oil supply for a DG is not available. However, the Condition is restricted to fuel oil level reductions that maintain at least a 6 day supply. These circumstances may be caused by events, such as full load operation required after an inadvertent start while at minimum required level, or feed and bleed operations, which may be necessitated by increasing particulate levels or any number of other oil quality degradations. 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 level prior to declaring the DG inoperable. This period is acceptable based on the remaining capacity (> 6 days), the fact that procedures will be initiated to obtain replenishment, and the low probability of an event during this brief period.

BASES

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ACTIONS (continued)

B.1

This Condition is entered as a result of a failure to meet the acceptance criterion of SR 3.8.3.2. Normally, trending of particulate levels allows sufficient time to correct high particulate levels prior to reaching the limit of acceptability. Poor sample procedures (bottom sampling), contaminated sampling equipment, and errors in laboratory analysis can produce failures that do not follow a trend. Since the presence of particulates does not mean failure of the fuel oil to burn properly in the diesel engine, and particulate concentration is unlikely to change significantly between Surveillance Frequency intervals, and proper engine performance has been recently demonstrated (within 31 days), it is prudent to allow a brief period prior to declaring the associated DG inoperable. The 7 day Completion Time allows for further evaluation, resampling and re-analysis of the DG fuel oil.

C.1

With the new fuel oil properties defined in the Bases for SR 3.8.3.2 not within the required limits (after having been added to the storage tank(s); thus making it part of the stored fuel), a period of 30 days is allowed for restoring the stored fuel oil properties. This period provides sufficient time to test the stored fuel oil to determine that the new fuel oil, when mixed with previously stored fuel oil, remains acceptable, or to restore the stored fuel oil properties. This restoration may involve feed and bleed procedures, filtering, or combinations of these procedures. Even if a DG start and load was required during this time interval and the fuel oil properties were outside limits, there is a high likelihood that the DG would still be capable of performing its intended function.

D.1

With a Required Action and associated Completion Time not met, or one or more DGs with fuel oil not within limits for reasons other than addressed by Conditions A through C, the associated DG may be incapable of performing its intended function and must be immediately declared inoperable.

BASES

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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 each DG's operation for 7 days at full load. The 7 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 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 of fuel oil prior to addition to the 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 storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks. These tests are to be conducted prior to adding the new fuel to the storage tank(s), but in no case is the time between sampling (and associated results) of new fuel and addition of new fuel oil to the storage tank to exceed 30 days. The tests, limits, and applicable ASTM Standards for the tests listed in the Diesel Fuel Oil Testing Program of Specification 5.5.13 are as follows:



BASES

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SURVEILLANCE REQUIREMENTS (continued)

- a. Sample the new fuel oil in accordance with ASTM D4057 (Ref. 6);
- b. Verify in accordance with the tests specified in ASTM D975-81 (Ref. 6) that the sample has an absolute specific gravity at 60°F of  $\geq 0.83$  and  $\leq 0.89$  or an API gravity at 60°F of  $\geq 27^\circ$  and  $\leq 39^\circ$ , a kinematic viscosity at 40°C of  $\geq 1.9$  centistokes and  $\leq 4.1$  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 D4176-82 (Ref. 6).

Failure to meet any of the above limits 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.

Following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975-81 (Ref. 7) are met for new fuel oil when tested in accordance with ASTM D975-81 (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1552-79 (Ref. 6) or ASTM D2622-82 (Ref. 6). These additional analyses are required by Specification 5.5.13, "Diesel Fuel Oil Testing Program," to be performed within 30 days following sampling and addition. This 30 day time period is intended to assure: 1) that the sample taken is not more than 30 days old at the time of adding the fuel oil to the storage tank, and 2) that the results of a new fuel oil sample (sample obtained prior to addition but not more than 30 days prior to) are obtained within 30 days after addition. The 30 day period is acceptable because the fuel oil properties of interest, even if they were not within stated limits, would not have an immediate effect on DG operation. This Surveillance ensures the availability of high quality fuel oil for the DGs.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

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 (Ref. 6). This method involves a 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. Each tank must be considered and tested separately since the total stored fuel oil volume is contained in two or more interconnected tanks.

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.

SR 3.8.3.3

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 consistent with the recommendations of 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.

BASES

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REFERENCES

1. UFSAR, Section 9.5.4.2.
2. Regulatory Guide 1.137.
3. ANSI N195-1976, Appendix B.
4. UFSAR, Chapter 6.
5. UFSAR, Chapter 15.
6. ASTM Standards: D4057; D975-81; D4176-82; D1552-79;  
D2622-82; D2276.
7. ASTM Standards, D975, Table 1.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.4 DC Sources – Operating

#### BASES

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##### BACKGROUND

The station DC electrical power system provides the AC emergency power system with control power. It also provides both motive and control power to selected safety related equipment and AC instrument bus power (via inverters). As required by 10 CFR 50, Appendix A, GDC 17 (Ref. 1), the DC electrical power system is designed to have sufficient independence, redundancy, and testability to perform its safety functions, assuming a single failure. The DC electrical power system also conforms to the recommendations of Regulatory Guide 1.6 (Ref. 2) and IEEE-308 (Ref. 3).

The 125 VDC electrical power system for each unit consists of two independent and redundant safety related Class 1E DC electrical power subsystems (Division 11 (21) and Division 12 (22)). Each subsystem consists of one 125 VDC battery, the associated battery charger for each battery, and all the associated control equipment and interconnecting cabling.

During normal operation, the 125 VDC loads are powered from the battery chargers with the batteries floating on the system. In case of a loss of normal power to the battery charger, the DC load is automatically powered from the station battery.

The Division 11 (21) and Division 12 (22) DC electrical power subsystems provide the control power for its associated Class 1E AC power load group, 4.16 kV switchgear, and 480 V load centers. The DC electrical power subsystems also provide DC electrical power to the inverters, which in turn power the AC instrument buses. Additionally, the Class 1E 125 VDC electrical power subsystems provide power to the 6.9 kV Reactor Coolant Pump (RCP) breakers and the non-Class 1E 125 VDC buses. The connection between the Class 1E and non-Class 1E 125 VDC buses contains fuses to ensure that a fault on the non-Class 1E bus does not cause a loss of the Class 1E bus.

## BASES

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### BACKGROUND (continued)

The DC power distribution system is described in more detail in Bases for LCO 3.8.9, "Distribution System - Operating," and LCO 3.8.10, "Distribution Systems - Shutdown."

Each battery was sized based upon supplying the design duty cycle in the event of a loss of offsite AC power concurrent with a Loss Of Coolant Accident (LOCA) and a single failure of a Diesel Generator (DG). Each battery has a nominal rating of 1760 ampere-hours for AT&T (2320 ampere-hours for C&D) at the 8 hour discharge rate to an end voltage of 1.75 volts per cell, and was sized based upon continuously carrying the various estimated loads. The batteries were sized in accordance with IEEE-485-1983 (Ref. 5).

Each 125 VDC battery is separately housed in a ventilated room apart from its charger and distribution centers. Each subsystem is located in an area separated physically and electrically from the other subsystem to ensure that a single failure in one subsystem does not cause a failure in a redundant subsystem. There is no sharing between redundant Class 1E subsystems, such as batteries, battery chargers, or distribution panels. While it is possible to interconnect the Unit 1 and Unit 2 DC electrical power subsystems, they normally remain disconnected, except when a DC source must be taken out of service for the purposes of maintenance and/or testing, or in the event of a failure of a DC source.

## BASES

## BACKGROUND (continued)

The crosstie between 125 VDC ESF buses 111 and 211 and the crosstie between 125 VDC ESF buses 112 and 212 are each provided with two normally locked open, manually operated circuit breakers. No interlocks are provided since the interconnected buses are not redundant. However, if one battery is inoperable, procedural and administrative controls are used to limit the connected load to 100 amps for AT&T (200 amps for C&D) based on not exceeding the OPERABLE battery capacity. These controls ensure that combinations of maintenance and test operations will not preclude the system capabilities to supply power to the ESF DC loads. The provisions of administratively controlled, manually actuated, interconnections between the non-redundant Class 1E DC buses increases the overall reliability and availability of the DC systems for each unit in that it provides a means for manually providing power to a DC bus at a time when it would otherwise have to be out-of-service (e.g., to perform a battery discharge test during an outage, to replace a damaged cell, etc.). Crosstie breaker closed alarms are also provided to alert the operator when the units are crosstied.

Each Division 11 (21) and Division 12 (22) DC electrical power subsystem battery charger has ample power output capacity for the steady state operation of connected loads required during normal operation, while at the same time maintaining its battery bank fully charged. Each battery charger also has sufficient capacity to restore the battery from the design minimum charge to its fully charged state within 24 hours while supplying normal steady state loads discussed in the UFSAR, Chapter 8 (Ref. 4).

BASES

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APPLICABLE  
SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 6), and in the UFSAR, Chapter 15 (Ref. 7), assume that Engineered Safety Feature (ESF) systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the DGs, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC sources is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the plant. This includes maintaining the DC electrical power distribution subsystem OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power sources; and
- b. A worst case single failure.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The DC electrical power subsystems, each subsystem consisting of:

- a. a battery;
- b. battery charger; and
- c. the corresponding control equipment and interconnecting cabling supplying power to the associated bus within the division.

are required to be OPERABLE to ensure the availability of the required power to shut down the reactor and maintain it in a safe condition after an Anticipated Operational Occurrence (AOO) or a postulated DBA. Loss of any division DC electrical power subsystem does not prevent the minimum safety function from being performed (Ref. 4). Furthermore, at least one crosstie breaker between Division 11 and Division 21, and at least one crosstie breaker between Division 12 and Division 22, is required to be open to maintain independence between the units.

An OPERABLE DC electrical power subsystem requires the required battery and respective charger to be operating and connected to the associated DC bus.

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### APPLICABILITY

The DC electrical power sources are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure safe unit operation and to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment integrity and other vital functions are maintained in the event of a postulated DBA.

The DC electrical power requirements for MODES 5 and 6 are addressed in LCO 3.8.5, "DC Sources - Shutdown."



## BASES

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### ACTIONS

#### A.1 and A.2

Condition A addresses the event of having one battery charger inoperable, and provides for restoration of electrical power to the associated DC bus by use of the crosstie capability to the opposite unit. The 2 hour Completion Time allows adequate time to evaluate the cause for battery charger failure, to determine whether the opposite unit's DC bus is available for support, and to perform the crosstie procedure. The battery charger is required to be restored to OPERABLE status within 24 hours in order to reestablish the independence of DC subsystems, while providing a reasonable amount of time for repairs. By limiting the crosstied conditions of operating units to 24 hours, the likelihood of an event occurring which could place either unit in jeopardy is minimized. (Note, there are no load restrictions applicable to the opposite unit's DC bus in this condition.)

#### B.1

Condition B addresses the situation of crosstieing the operating unit's DC bus to the opposite unit, which has an inoperable battery charger, when the opposite unit is operating in MODE 1, 2, 3, or 4. This provision is included to accommodate unexpected failures, maintenance, and/or testing of the opposite unit's DC subsystems. The Completion Time for Required Action B.1 of 60 hours is adequate to allow testing and restoration activities. In this Condition, the opposite unit's battery is assumed to remain OPERABLE. Therefore, the function of the crosstie is to maintain the opposite unit's battery fully charged and to supply the minimal opposite unit DC loads. The 60 hours is based on the 24 hours the opposite unit has to restore the inoperable charger and the 36 hours the opposite unit would have to reach MODE 5, if the charger is not restored to OPERABLE status. When the opposite unit reaches MODE 5, Condition C is entered. Requiring the associated crosstie breaker to be opened within 60 hours also ensures that independence of the DC subsystems is reestablished.

BASES

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ACTIONS (continued)

C.1 and C.2

Condition C addresses an operating unit's DC bus that is crosstied to the opposite unit's associated DC bus, which has an inoperable source (i.e., battery or battery charger), when the opposite unit is shutdown. This provision is included to accommodate maintenance and/or testing of the shutdown unit's DC subsystems.

With the shutdown unit's battery inoperable, the operating unit will be required to supply all loads on the shutdown unit's crosstied bus should an event occur on the shutdown unit. Therefore, Required Action C.1 specifies that the possible loading on the shutdown unit's DC bus be verified to be  $\leq 100$  amps for AT&T ( $\leq 200$  amps for C&D) once per 12 hours. Limiting the load to 100 amps for AT&T (200 amps for C&D) ensures that the operating unit's DC subsystem will not be overloaded in the event of a concurrent event on the operating unit. Required Action C.1 is modified by a Note only requiring Required Action C.1 when the opposite unit has an inoperable battery.

Required Action C.2 requires the associated crosstie breaker to be opened within 7 days and ensures that measures are being taken to restore the inoperable battery or battery charger and reestablish independence of the DC subsystems.

## BASES

## ACTIONS (continued)

D.1

Condition D represents one division with a loss of ability to completely respond to an event, and a potential loss of ability for the DC division to remain energized during normal operation. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for complete loss of DC power to the affected division. The 2 hour limit is consistent with the allowed time for an inoperable DC distribution system division.

If one of the required DC electrical power subsystems is inoperable (e.g., inoperable battery or one DC division crosstied to the opposite-unit DC division that does not have an inoperable battery charger), the remaining DC electrical power subsystem has the capacity to support a safe shutdown and to mitigate an accident condition. Since a subsequent worst case single failure would, however, result in the complete loss of the remaining 125 VDC electrical power subsystems with attendant loss of ESF functions, continued power operation should not exceed 2 hours. The 2 hour Completion Time is based on Regulatory Guide 1.93 (Ref. 8) and reflects a reasonable time to assess unit status as a function of the inoperable DC electrical power subsystem and, if the DC electrical power subsystem is not restored to OPERABLE status, to prepare to effect an orderly and safe unit shutdown.

E.1 and E.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status, or the crosstie breaker(s) cannot be opened, within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 8).

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.4.1

Verifying battery terminal voltage while on float charge helps to ensure the effectiveness of the charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the connected loads and the continuous charge required to overcome the internal losses of a battery and maintain the battery in a fully charged state. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 9).

SR 3.8.4.2

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The limits established for this SR must not be above the ceiling value established by the manufacturer.

Connection resistance is obtained by subtracting the normal resistance of the interrack (cross room rack) connector or the intertier (bi-level rack) connector from the measured intercell (cell-to-cell) connection resistance.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.4.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance. The presence of physical damage or deterioration does not necessarily represent a failure of this SR, provided an evaluation determines that the physical damage or deterioration does not affect the OPERABILITY of the battery (its ability to perform its design function).

SR 3.8.4.4 and SR 3.8.4.5

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance SR. The presence of visible corrosion does not necessarily represent a failure of this SR provided visible corrosion is removed during performance of SR 3.8.4.4.

The connection resistance limits for SR 3.8.4.5 shall not be above the ceiling value established by the manufacturer.

Connection resistance is obtained by subtracting the normal resistance of the interrack (cross room rack) connector or the intertier (bi-level rack) connector from the measured intercell (cell-to-cell) connection resistance.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.4.6

This SR requires that each battery charger be capable of supplying 400 amps and 125 V for  $\geq 8$  hours. These requirements are based on the design capacity of the chargers (Ref. 4). According to Regulatory Guide 1.32 (Ref. 10), the battery charger output capacity is required to be based on the largest combined demands of the various steady state loads and the charging demands to restore the battery from the design minimum charge state to the fully charged state, irrespective of the status of the unit during these demand occurrences. The minimum required amperes and duration ensures that these requirements can be satisfied.

The Surveillance Frequency is acceptable, given the unit conditions required to perform the test and the other administrative controls existing to ensure adequate charger performance during these 18 month intervals. In addition, this Frequency is intended to be consistent with expected fuel cycle lengths.

This Surveillance is required to be performed during MODES 5 and 6 since it would require the DC electrical power subsystem to be inoperable during performance of the test.

SR 3.8.4.7

A battery service test is a special test of battery capability, as found, to satisfy the design requirements (battery duty cycle) of the DC electrical power system. The discharge rate and test length should correspond to the design duty cycle requirements as specified in Reference 4.

The Surveillance Frequency of 18 months is consistent with the recommendations of Regulatory Guide 1.32 (Ref. 10) and Regulatory Guide 1.129 (Ref. 11), which state that the battery service test should be performed during refueling operations or at some other outage, with intervals between tests, not to exceed 18 months.

This SR is modified by two Notes. Note 1 allows the performance of a modified performance discharge test in lieu of a service test.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The modified performance discharge test is a simulated duty cycle consisting of just two rates; the one minute rate published for the battery or the largest current load of the duty cycle, followed by the test rate employed for the performance test, both of which envelop the duty cycle of the service test. Since the ampere-hours removed by a rated one minute discharge represents a very small portion of the battery capacity, the test rate can be changed to that for the performance test without compromising the results of the performance discharge test. The battery terminal voltage for the modified performance discharge test should remain above the minimum battery terminal voltage specified in the battery service test for the duration of time equal to that of the service test.

A modified performance discharge test is a test of the battery capacity and its ability to provide a high rate, short duration load (usually the highest rate of the duty cycle). This will often confirm the battery's ability to meet the critical period of the load duty cycle, in addition to determining its percentage of rated capacity. Initial conditions for the modified performance discharge test should be identical to those specified for a service test and the test discharge rate must envelop the duty cycle of the service test if the modified performance discharge test is performed in lieu of a service test.

The reason for Note 2 is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.8.4.8

A battery performance discharge test is a test of constant current capacity of a battery, normally done in the as found condition, after having been in service, to detect any change in the capacity determined by the acceptance test. The test is intended to determine overall battery degradation due to age and usage.

A battery modified performance discharge test is described in the Bases for SR 3.8.4.7. Either the battery performance discharge test or the modified performance discharge test is acceptable for satisfying SR 3.8.4.8, however, only the modified performance discharge test may be used to satisfy SR 3.8.4.8 while satisfying the requirements of SR 3.8.4.7 at the same time.

AT&T Batteries: AT&T battery manufacturer's data indicates that the capacity of the battery actually increases over its service life. The NRC has concurred that the battery meets acceptable operating criteria if it can be shown that battery capacity for the AT&T batteries is at least 95% of the manufacturer's rating when subjected to a performance discharge test every 60 months.

C&D Batteries: The acceptance criteria for this Surveillance are consistent with IEEE-450 (Ref. 9) and IEEE-485 (Ref. 5). These references recommend that the battery be replaced if its capacity is below 80% of the manufacturer's rating. A capacity of 80% shows that the battery rate of deterioration is increasing, even if there is ample capacity to meet the load requirements.



BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Surveillance Frequency for this test is normally 60 months. If the battery shows degradation, or if the battery has reached 85% of its expected life and capacity is < 100% of the manufacturer's rating, the Surveillance Frequency is reduced to 12 months. However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity  $\geq$  100% of the manufacturer's rating. Degradation is indicated, according to IEEE-450 (Ref. 9), when the battery capacity drops by more than 5% for AT&T (10% for C&D) relative to its capacity on the previous performance test or when it is > 0% for AT&T (> 10% for C&D) below the manufacturer's rating. These Frequencies are consistent with the recommendations in IEEE-450 (Ref. 9).

This SR is modified by a Note. The reason for the Note is that performing the Surveillance would perturb the electrical distribution system and challenge safety systems.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 17.
2. Regulatory Guide 1.6, March 10, 1971.
3. IEEE-308-1978.
4. UFSAR, Section 8.3.2.1.
5. IEEE-485-1983, June 1983.
6. UFSAR, Chapter 6.
7. UFSAR, Chapter 15.
8. Regulatory Guide 1.93, December 1974.
9. IEEE-450-1995.
10. Regulatory Guide 1.32, February 1977.
11. Regulatory Guide 1.129, December 1974.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.5 DC Sources - Shutdown

#### BASES

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BACKGROUND      A description of the DC sources is provided in the Bases for LCO 3.8.4, "DC Sources - Operating."

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APPLICABLE SAFETY ANALYSES      The initial conditions of Design Basis Accident and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume that Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum DC electrical power sources during MODES 5 and 6 and during movement of irradiated fuel assemblies ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for extended periods;
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c. Adequate DC electrical power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.

The DC sources satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO

The DC electrical power subsystems with:

- a. at least one subsystem consisting of a battery and battery charger;
- b. when the redundant division of the Class 1E DC electrical power distribution subsystem is required by LCO 3.8.10, the other subsystem consisting of either a battery or a charger; and
- c. the corresponding control equipment, and interconnecting cabling within the division(s)

are required to be OPERABLE to support required division(s) of the distribution systems required OPERABLE by LCO 3.8.10, "Distribution Systems - Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents). Furthermore, at least one unit crosstie breaker per division is required to be open to maintain independence between the units.

LCO 3.8.5 is modified by a Note which allows one division to be crosstied to the opposite unit, when the opposite unit is in MODE 1, 2, 3, or 4 with an inoperable charger. No load restrictions are placed on the bus loading, when the one division is crosstied.

## BASES

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- APPLICABILITY      The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and at all times during movement of irradiated fuel assemblies, provide assurance that:
- a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core;
  - b. Required features needed to mitigate a fuel handling accident are available;
  - c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
  - d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.
- The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.
- 

- ACTIONS            LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be sufficient reason to require a reactor shutdown.

## BASES

## ACTIONS (continued)

A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5

If two divisions are required by LCO 3.8.10, the remaining division with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features inoperable with the associated DC power source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features' LCO ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, operations involving positive reactivity additions, and declare the affected Low Temperature Overpressure Protection (LTOP) features, required by LCO 3.4.12, inoperable). The Required Action to declare the associated LTOP features inoperable allows the operator to evaluate the current unit conditions and to determine which (if any) of the LTOP features have been affected by the loss of power. The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained. Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

BASES

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ACTIONS (continued)

B.1 and B.2

Condition B addresses a shutdown unit's DC bus that is crosstied to the opposite unit's associated DC bus, which has an inoperable source, when the opposite unit is also shutdown. This provision is included to accommodate maintenance and/or testing of the opposite unit's DC subsystems.

With the opposite unit's battery inoperable, the unit-specific DC subsystem will be required to supply all loads on the opposite unit's crosstied bus should an event occur on the opposite unit. Therefore, Required Action B.1 specifies that the possible loading on the opposite unit's DC bus be verified to be  $\leq 100$  amps for AT&T ( $\leq 200$  amps for C&D) once per 12 hours. Limiting the load to 100 amps for AT&T (200 amps for C&D), ensures that the unit-specific DC subsystem will not be overloaded in the event of a concurrent event on the unit. Required Action B.1 is modified by a Note requiring Required Action B.1 when the opposite unit has an inoperable battery.

Required Action B.2 requires the associated crosstie breaker to be opened within 7 days ensures that measures are being taken to reestablish independence of the DC subsystems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.5.1

SR 3.8.5.1 requires application of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.8. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

BASES

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REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.6 Battery Cell Parameters

#### BASES

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**BACKGROUND** This LCO delineates the limits on electrolyte temperature, level, float voltage, and specific gravity for the DC power source batteries. A discussion of these batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources - Operating," and LCO 3.8.5, "DC Sources - Shutdown."

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**APPLICABLE SAFETY ANALYSES** The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the plant. This includes maintaining at least one division of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

Battery cell parameters satisfy the Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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**LCO** Battery cell parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Electrolyte limits are conservatively established, allowing continued DC electrical system function even with Category A and B limits not met.

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## BASES

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**APPLICABILITY** The battery cell parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery electrolyte is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

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**ACTIONS** The ACTIONS Table is modified by a Note which indicates that separate Condition entry is allowed for each battery. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each affected battery. Complying with the Required Actions for one battery may allow for continued operation, and subsequent battery parameters out of limits are governed by separate Condition entry and application of associated Required Actions.

### A.1, A.2, and A.3

With one or more cells in one or more batteries not within limits (i.e., Category A limits not met, Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table 3.8.6-1 in the accompanying LCO, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met and operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cell. One hour is considered a reasonable amount of time to perform the required verification.

BASES

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ACTIONS (continued)

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery is still capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A or B limits. This periodic verification is consistent with the normal Frequency of pilot cell surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable prior to declaring the battery inoperable.

B.1

With one or more batteries with one or more battery cell parameters outside the Category C limit for any connected cell, sufficient capacity to supply the maximum expected load requirement is not assured and the corresponding DC electrical power subsystem must be declared inoperable. Additionally, other potentially extreme conditions, such as not completing the Required Actions of Condition A within the required Completion Time or average electrolyte temperature of representative cells falling below 60°F, are also cause for immediately declaring the associated DC electrical power subsystem inoperable.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.6.1

This SR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte level of pilot cells.

SR 3.8.6.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 7 days of a battery discharge  $< 110$  V or a battery overcharge  $> 145$  V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to  $< 110$  V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

SR 3.8.6.3

This Surveillance verification that the average temperature of representative cells is  $\geq 60^{\circ}\text{F}$ , is consistent with a recommendation of IEEE-450 (Ref. 3), that states that the temperature of electrolytes in representative cells should be determined on a quarterly basis.

Lower than normal temperatures act to inhibit or reduce battery capacity. This SR ensures that the operating temperatures remain within an acceptable operating range. This limit is based on manufacturer recommendations.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

Table 3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage, and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra  $\frac{1}{4}$  inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote (a) to Table 3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is  $\geq 2.18$  V for AT&T ( $\geq 2.13$  V for C&D) per cell. This value is based on the recommendations of IEEE-450 (Ref. 3), which states that prolonged operation of cells  $< 2.18$  V for AT&T ( $< 2.13$  V for C&D) can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is  $\geq 1.285$  for AT&T ( $\geq 1.200$  for C&D) (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 3), the specific gravity readings are based on a temperature of 77°F (25°C).

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The specific gravity readings are corrected for actual electrolyte temperature and level for AT&T (for actual electrolyte temperature for C&D). For each 3°F (1.67°C) above 77°F (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each 3°F below 77°F.

Category B defines the normal parameter limits for each connected cell. The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. Footnote (b) to Table 3.8.6-1 requires the float voltage correction for average electrolyte temperature. The Category B limit specified for specific gravity for each connected cell is  $\geq 1.280$  for AT&T ( $\geq 1.195$  for C&D) (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells  $> 1.290$  for AT&T ( $> 1.205$  for C&D) (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety. When any battery parameter is outside the Category C limits, the assurance of sufficient capacity described above no longer exists, and the battery must be declared inoperable.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.14 V for AT&T (2.07 V for C&D) or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity  $\geq 1.280$  for AT&T ( $\geq 1.195$  for C&D) is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

The footnotes to Table 3.8.6-1 are applicable to Category A, B, and C specific gravity. Footnote (c) to Table 3.8.6-1 requires the above mentioned correction for electrolyte level and temperature for AT&T (for electrolyte temperature for C&D), with the exception that level correction (for AT&T) is not required when battery charging current is  $< 2$  amps on float charge. This current provides, in general, an indication of overall (AT&T) battery condition.

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (d) to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. Within 7 days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than 7 days.

BASES

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REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.
3. IEEE-450-1995.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.7 Inverters – Operating

#### BASES

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**BACKGROUND** The inverters are the preferred source of power for the AC instrument buses because of the stability and reliability they provide. Each of the four AC instrument buses (2 per division) is normally supplied AC electrical power by a dedicated inverter. The inverters can be powered from an AC source/rectifier or from an associated 125 VDC battery. The battery provides an uninterruptible power source for the instrumentation and controls for the Reactor Protective System (RPS) and the Engineered Safety Feature Actuation System (ESFAS). Specific details on inverters and their operating characteristics are found in the UFSAR, Chapter 8 (Ref. 1).

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**APPLICABLE SAFETY ANALYSES** The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 2) and Chapter 15 (Ref. 3), assume Engineered Safety Feature Systems are OPERABLE. The inverters are designed to provide the required capacity, capability, redundancy, and reliability to ensure the availability of necessary power to the RPS and ESFAS instrumentation and controls so that the fuel, Reactor Coolant System, and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.4, Reactor Coolant System (RCS); and Section 3.6, Containment Systems.



BASES

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APPLICABLE SAFETY ANALYSES (continued)

The OPERABILITY of the inverters is consistent with the initial assumptions of the accident analyses and is based on meeting the design basis of the plant. This includes maintaining required AC instrument buses OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite AC electrical power or all onsite AC electrical power sources; and
- b. A worst case single failure.

Inverters are a part of the distribution system and, as such, satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

The inverters ensure the availability of AC electrical power for the systems instrumentation required to shut down the reactor and maintain it in a safe condition after an Anticipated Operational Occurrence (AOO) or a postulated DBA.

Maintaining the required inverters OPERABLE ensures that the redundancy incorporated into the design of the RPS and ESFAS instrumentation and controls is maintained. The four inverters ensure an uninterruptible supply of AC electrical power to the AC instrument buses even if the 4.16 kV safety buses are de-energized.

OPERABLE inverters require the associated instrument bus to be powered by the inverter with output voltage within tolerances, and power input to the inverter from the associated 125 VDC battery. The power supply may be from an AC source via rectifier as long as the battery is connected as the uninterruptible power supply.

## BASES

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APPLICABILITY      The inverters are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

Inverter requirements for MODES 5 and 6 are covered in LCO 3.8.8, "Inverters - Shutdown."

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## ACTIONS

### A.1

With a required inverter inoperable, its associated AC instrument bus may be inoperable unless it is manually re-energized from its Class 1E constant voltage source transformer.

For this reason a Note has been included in Condition A requiring the entry into the Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating" for any de-energized instrument bus. This ensures that the instrument bus is re-energized within 2 hours.

Required Action A.1 allows 24 hours to fix the inoperable inverter and return it to service. The 24 hour limit is based upon engineering judgment, taking into consideration the time required to repair an inverter and the additional risk to which the unit is exposed because of the inverter inoperability. This has to be balanced against the risk of an immediate shutdown, along with the potential challenges to safety systems such a shutdown might entail. When the AC instrument bus is powered from its constant voltage source, it is relying upon interruptible AC electrical power sources (offsite and onsite). The uninterruptible inverter source to the AC instrument buses is the preferred source for powering instrumentation trip setpoint devices.

BASES

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ACTIONS (continued)

B.1 and B.2

If the inoperable devices or components cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.7.1

This Surveillance verifies that the inverters are functioning properly with all required circuit breakers closed and AC instrument buses energized from the inverter. The verification of proper voltage output ensures that the required power is readily available for the instrumentation of the RPS and ESFAS connected to the AC instrument buses. The 7 day Frequency takes into account the redundant capability of the inverters and other indications available in the control room that alert the operator to inverter malfunctions.

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REFERENCES

1. UFSAR, Chapter 8.
2. UFSAR, Chapter 6.
3. UFSAR, Chapter 15.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.8 Inverters – Shutdown

#### BASES

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BACKGROUND            A description of the inverters is provided in the Bases for LCO 3.8.7, "Inverters – Operating."

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APPLICABLE SAFETY ANALYSES    The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume Engineered Safety Feature systems are OPERABLE. The DC to AC inverters are designed to provide the required capacity, capability, redundancy, and reliability to ensure the availability of necessary power to the Reactor Protective System and Engineered Safety Features Actuation System instrumentation and controls so that the fuel, Reactor Coolant System, and containment design limits are not exceeded.

The OPERABILITY of the inverters is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the inverter to each required AC instrument bus during MODES 5 and 6 ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for extended periods;
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c. Adequate power is available to mitigate events postulated during shutdown, such as a fuel handling accident.

The inverters were previously identified as part of the distribution system and, as such, satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

The inverters ensure the availability of electrical power for the instrumentation for systems required to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. One AC instrument bus division energized by two battery powered inverters provides uninterruptible supply of AC electrical power to at least one AC instrument bus division even if the 4.16 kV safety buses are de-energized. OPERABILITY of these two inverters requires that the associated AC instrument buses be powered by the inverters. When the redundant division of the Class 1E AC instrument bus electrical power distribution subsystem is required by LCO 3.8.10, the power source for the AC instrument buses may consist of:

- a. one inverter powered by its associated battery;
- b. one inverter powered by its internal AC source; or
- c. one Class 1E constant voltage source transformer.

This ensures the availability of sufficient inverter power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

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### APPLICABILITY

The inverters required to be OPERABLE in MODES 5 and 6, and at all times during movement of irradiated fuel assemblies, provide assurance that:

- a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel in the core;
- b. Systems needed to mitigate a fuel handling accident are available;
- c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

BASES

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APPLICABILITY (continued)

Inverter requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.7.

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ACTIONS

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be sufficient reason to require a reactor shutdown.

## BASES

### ACTIONS (continued)

#### A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5

With one or more required AC instrument bus power sources inoperable when two divisions are required by LCO 3.8.10, "Distribution Systems–Shutdown," the remaining OPERABLE AC instrument bus power sources may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement, or operations with a potential for positive reactivity additions. By the allowance of the option to declare required features inoperable with the associated inverter(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCOs' Required Actions. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, operations involving positive reactivity additions, and declare the associated Low Temperature Overpressure Protection (LTOP) features inoperable). The Required Action to declare the associated LTOP features inoperable allows the operator to evaluate the current unit conditions and to determine which (if any) of the LTOP features have been affected by the loss of power. If the LTOP features have not been affected, then unnecessarily restrictive actions may be averted. The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained. Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required inverters and to continue this action until restoration is accomplished in order to provide the necessary inverter power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required inverters should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.8.1

This Surveillance verifies that the inverters are functioning properly with all required circuit breakers closed and required AC instrument buses energized. The verification of proper voltage output ensures that the required power is readily available for the instrumentation connected to the AC instrument buses. The 7 day Frequency takes into account the reliability of the instrument bus power sources and other indications available in the control room that alert the operator to malfunctions.

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REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.



BASES

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## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.9 Distribution Systems – Operating

#### BASES

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##### BACKGROUND

The onsite Class 1E AC, DC, and AC instrument bus electrical power distribution systems are divisionalized into two redundant and independent AC, DC, and AC instrument bus electrical power distribution subsystems.

The AC electrical power subsystem for each division consists of a primary 4.16 kV Engineered Safety Feature (ESF) bus and a primary 480 V ESF bus. The division also includes (but is not included in the subsystem required to be OPERABLE by LCO 3.8.9) secondary 480 and 120 V buses, motor control centers, and distribution panels. Each 4.16 kV ESF bus has at least one separate and independent offsite source of power as well as a dedicated onsite Diesel Generator (DG) source. Each 4.16 kV ESF bus is normally connected to a normal offsite source. After a loss of the normal offsite power source to a 4.16 kV ESF bus the onsite emergency DG supplies power to the 4.16 kV ESF bus. A transfer to the reserve offsite source can be accomplished manually. Control power for the 4.16 kV breakers is supplied from the Class 1E 125 VDC electrical power distribution subsystem. Additional description of this system may be found in the Bases for LCO 3.8.1, "AC Sources – Operating," and the Bases for LCO 3.8.4, "DC Sources – Operating."

The four 120 VAC instrument buses (considered distinct from the AC electrical power distribution subsystem) are arranged in two load groups per division and are normally powered from the inverters. The alternate power supply for the instrument buses are Class 1E constant voltage source transformers powered from the same division as the associated inverter, and its use is governed by LCO 3.8.7, "Inverters – Operating." Each constant voltage source transformer is powered from a Class 1E AC bus.

There are two independent 125 VDC electrical power distribution subsystems (one for each division).

## BASES

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### APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 1), and in the UFSAR, Chapter 15 (Ref. 2), assume ESF systems are OPERABLE. The AC, DC, and AC instrument bus electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded. These limits are discussed in more detail in the Bases for Section 3.2, Power Distribution Limits; Section 3.4, Reactor Coolant System (RCS); and Section 3.6, Containment Systems.

The OPERABILITY of the AC, DC, and AC instrument bus electrical power distribution systems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the plant. This includes maintaining power distribution systems OPERABLE during accident conditions in the event of:

- a. An assumed loss of all offsite power or all onsite AC electrical power sources; and
- b. A worst case single failure.

The distribution systems satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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### LCO

The required power distribution subsystems ensure the availability of AC, DC, and AC instrument bus electrical power for the systems required to shut down the reactor and maintain it in a safe condition after an Anticipated Operational Occurrence (AOO) or a postulated DBA. The AC, DC, and AC instrument bus electrical power distribution subsystems are required to be OPERABLE.

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BASES

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LCO (continued)

Maintaining the Division 1 and Division 2 AC, DC, and AC instrument bus electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated into the design of ESF is not defeated. Therefore, a single failure within any system or within the electrical power distribution subsystems will not prevent safe shutdown of the reactor.

OPERABLE AC electrical power distribution subsystems require the associated buses to be energized to their proper voltages. The division also includes (but is not included in the subsystem required to be OPERABLE by LCO 3.8.9) secondary 480 and 120 V buses, motor control centers, and distribution panels. OPERABLE DC electrical power distribution subsystems require the associated buses to be energized to their proper voltage from either the associated battery or charger. OPERABLE instrument bus electrical power distribution subsystems require the associated buses to be energized to their proper voltage from the associated inverter via inverted DC voltage, inverter using AC source, or Class 1E constant voltage transformer.

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APPLICABILITY

The electrical power distribution subsystems are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided, and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

Electrical power distribution subsystem requirements for MODES 5 and 6 are covered in LCO 3.8.10, "Distribution Systems - Shutdown."

BASES

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ACTIONS

A.1

With one AC bus, except AC instrument buses, inoperable, the remaining AC electrical power distribution subsystem is capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure. The overall reliability is reduced, however, because a single failure in the remaining power distribution subsystem could result in the minimum required ESF functions not being supported. Therefore, the required AC bus must be restored to OPERABLE status within 8 hours.

Condition A worst scenario is one division without AC power (i.e., no offsite power to the division and the associated DG inoperable). In this Condition, the unit is more vulnerable to a complete loss of AC power. It is, therefore, imperative that the unit operator's attention be focused on minimizing the potential for loss of power to the remaining division by stabilizing the unit, and on restoring power to the affected division. The 8 hour time limit before requiring a unit shutdown in this Condition is acceptable because of:

- a. The potential for decreased safety if the unit operator's attention is diverted from the evaluations and actions necessary to restore power to the affected division, to the actions associated with taking the unit to shutdown within this time limit; and
- b. The low probability for an event in conjunction with a single failure of a redundant component in the division with AC power.

BASES

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ACTIONS (continued)

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition A is entered while, for instance, a DC bus is inoperable and subsequently restored OPERABLE, the LCO may already have been not met for up to 2 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the AC distribution system. At this time, a DC circuit could again become inoperable, and AC distribution restored OPERABLE. This could continue indefinitely.

The Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition A was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

B.1

With one AC instrument bus inoperable, the remaining OPERABLE AC instrument buses are capable of supporting the minimum safety functions necessary to shut down the unit and maintain it in the safe shutdown condition. Overall reliability is reduced, however, since an additional single failure could result in the minimum required ESF functions not being supported. Therefore, the required AC instrument bus must be restored to OPERABLE status within 2 hours by powering the bus from the associated inverter via inverted DC, inverter using AC source, or Class 1E constant voltage transformer.

BASES

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ACTIONS (continued)

Condition B represents one AC instrument bus without power; potentially both the DC source and the associated AC source are nonfunctioning. In this situation, the unit is significantly more vulnerable to a complete loss of all noninterruptible power. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining instrument buses and restoring power to the affected instrument bus.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that are without adequate AC instrument power. Taking exception to LCO 3.0.2 for components without adequate AC instrument power, that would have the Required Action Completion Times shorter than 2 hours if declared inoperable, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) and not allowing stable operations to continue;
- b. The potential for decreased safety by requiring entry into numerous Applicable Conditions and Required Actions for components without adequate AC instrument power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected bus(es); and
- c. The low probability for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time takes into account the importance to safety of restoring the AC instrument bus(es) to OPERABLE status, the redundant capability afforded by the other OPERABLE instrument buses, and the low probability of a DBA occurring during this period.

BASES

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ACTIONS (continued)

The second Completion Time for Required Action B.1 establishes a limit on the maximum allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition B is entered while, for instance, an AC bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the instrument bus distribution system. At this time, an AC bus could again become inoperable, and instrument bus distribution restored OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition B was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

C.1

With one DC bus inoperable, the remaining DC electrical power distribution subsystem is capable of supporting the minimum safety functions necessary to shut down the reactor and maintain it in a safe shutdown condition, assuming no single failure. The overall reliability is reduced, however, because a single failure in the remaining DC electrical power distribution subsystem could result in the minimum required ESF functions not being supported. Therefore, the DC bus must be restored to OPERABLE status within 2 hours by powering the bus from the associated battery or charger.



BASES

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ACTIONS (continued)

Condition C represents one division without adequate DC power; potentially both with the battery significantly degraded and the associated charger nonfunctioning and not crosstied to the other unit. In this situation, the unit is significantly more vulnerable to a complete loss of all DC power. It is, therefore, imperative that the operator's attention focus on stabilizing the unit, minimizing the potential for loss of power to the remaining divisions and restoring power to the affected division.

This 2 hour limit is more conservative than Completion Times allowed for the vast majority of components that would be without power. Taking exception to LCO 3.0.2 for components without adequate DC power, which would have Required Action Completion Times shorter than 2 hours, is acceptable because of:

- a. The potential for decreased safety by requiring a change in unit conditions (i.e., requiring a shutdown) while allowing stable operations to continue;
- b. The potential for decreased safety by requiring entry into numerous applicable Conditions and Required Actions for components without DC power and not providing sufficient time for the operators to perform the necessary evaluations and actions for restoring power to the affected division; and
- c. The low probability for an event in conjunction with a single failure of a redundant component.

The 2 hour Completion Time for DC buses is consistent with Regulatory Guide 1.93 (Ref. 3).

BASES

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ACTIONS (continued)

The second Completion Time for Required Action C.1 establishes a limit on the maximum time allowed for any combination of required distribution subsystems to be inoperable during any single contiguous occurrence of failing to meet the LCO. If Condition C is entered while, for instance, an AC bus is inoperable and subsequently returned OPERABLE, the LCO may already have been not met for up to 8 hours. This could lead to a total of 10 hours, since initial failure of the LCO, to restore the DC distribution system. At this time, an AC bus could again become inoperable, and DC distribution restored OPERABLE. This could continue indefinitely.

This Completion Time allows for an exception to the normal "time zero" for beginning the allowed outage time "clock." This will result in establishing the "time zero" at the time the LCO was initially not met, instead of the time Condition C was entered. The 16 hour Completion Time is an acceptable limitation on this potential to fail to meet the LCO indefinitely.

D.1 and D.2

If the inoperable distribution subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to 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 plant systems.

E.1

With two electrical power distribution subsystems inoperable that result in a loss of safety function, adequate core cooling, containment OPERABILITY and other vital functions for DBA mitigation would be compromised, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.8.9.1

This Surveillance verifies that the required AC, DC, and AC instrument bus electrical power distribution systems are functioning properly, with the correct circuit breaker alignment. The correct breaker alignment ensures the appropriate separation and independence of the electrical divisions is maintained, and the appropriate voltage is available to each required bus. The verification of proper voltage availability on the buses ensures that the required voltage is readily available for motive as well as control functions for critical system loads connected to these buses. The 7 day Frequency takes into account the redundant capability of the AC, DC, and AC instrument bus electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions.

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REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.
3. Regulatory Guide 1.93, December 1974.

## B 3.8 ELECTRICAL POWER SYSTEMS

### B 3.8.10 Distribution Systems – Shutdown

#### BASES

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BACKGROUND      A description of the AC, DC, and AC instrument bus electrical power distribution systems is provided in the Bases for LCO 3.8.9, "Distribution Systems – Operating."

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APPLICABLE  
SAFETY ANALYSES      The initial conditions of Design Basis Accident and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume Engineered Safety Feature (ESF) systems are OPERABLE. The AC, DC, and AC instrument bus electrical power distribution systems are designed to provide sufficient capacity, capability, redundancy, and reliability to ensure the availability of necessary power to ESF systems so that the fuel, Reactor Coolant System, and containment design limits are not exceeded.

The OPERABILITY of the AC, DC, and AC instrument bus electrical power distribution system is consistent with the initial assumptions of the accident analyses and the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the minimum AC, DC, and AC instrument bus electrical power distribution subsystems during MODES 5 and 6, and during movement of irradiated fuel assemblies ensures that:

- a. The unit can be maintained in the shutdown or refueling condition for extended periods;
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c. Adequate power is provided to mitigate events postulated during shutdown, such as a fuel handling accident.

The AC and DC electrical power distribution systems satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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LCO Various subsystems, equipment, and components are required OPERABLE by other LCOs, depending on the specific unit condition. Implicit in those requirements is the OPERABILITY of necessary support features (i.e. systems, subsystems, trains, components, and devices). This LCO explicitly requires energization of the portions of the electrical distribution system necessary to support OPERABILITY of required subsystems, equipment, and components - whether specifically addressed in an LCO or implicitly required via the definition of OPERABILITY.

Maintaining these portions of the distribution system energized ensures the availability of sufficient power to operate the unit in a safe manner to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

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APPLICABILITY The AC and DC electrical power distribution subsystems required to be OPERABLE in MODES 5 and 6, and at all times during movement of irradiated fuel assemblies, provide assurance that:

- a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel in the core;
- b. Systems needed to mitigate a fuel handling accident are available;
- c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition and refueling condition.

The AC, DC, and AC instrument bus electrical power distribution subsystems requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.9.

BASES

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ACTIONS

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies would not be sufficient reason to require a reactor shutdown.

A.1, A.2.1, A.2.2, A.2.3, A.2.4, A.2.5, and A.2.6

Although redundant required features may require redundant divisions of electrical power distribution subsystems to be OPERABLE, one OPERABLE distribution subsystem division may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features associated with an inoperable distribution subsystem inoperable (Required Action A.1), appropriate restrictions are implemented in accordance with the affected required feature LCO's Required Actions. In many instances, however, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions of Required Actions A.2.1 through A.2.4 is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC and DC electrical power distribution subsystems and to continue this action until restoration is accomplished in order to provide the necessary power to the unit safety systems.

## BASES

### ACTIONS (continued)

Notwithstanding performance of the above conservative Required Actions, a required Residual Heat Removal (RHR) train and/or a required Low Temperature Overpressure Protection (LTOP) feature, may be inoperable. In this case, Required Actions A.2.1 through A.2.4 do not adequately address the concerns relating to coolant circulation and heat removal. Pursuant to LCO 3.0.6, the RHR or LTOP ACTIONS would not be entered. Therefore, Required Actions A.2.5 and A.2.6 are provided to direct declaring RHR and LTOP features inoperable and declaring the associated RHR train "not in operation" (note, this does not require the RHR train to be shut down if operating, only that the associated RHR train not be credited as the required operating train), which results in taking the appropriate actions.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required distribution subsystems should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power.

### SURVEILLANCE REQUIREMENTS

#### SR 3.8.10.1

This Surveillance verifies that the AC, DC, and AC instrument bus electrical power distribution subsystems are functioning properly, with all the buses energized. The verification of proper voltage availability on the buses ensures that the required power is readily available for motive as well as control functions for critical system loads connected to these buses. The 7 day Frequency takes into account the capability of the electrical power distribution subsystems, and other indications available in the control room that alert the operator to subsystem malfunctions.

### REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.

## B 3.9 REFUELING OPERATIONS

### B 3.9.1 Boron Concentration

#### BASES

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##### BACKGROUND

The limit on the boron concentration ensures the reactor remains subcritical during MODE 6. Refueling boron concentration is the soluble boron concentration in the filled portions of the Reactor Coolant System (RCS), the refueling canal, and the refueling cavity that are hydraulically coupled to the reactor core during refueling.

The soluble boron concentration offsets the core reactivity and is measured by chemical analysis of a representative sample of the coolant in each of the volumes. The refueling boron concentration limit is specified in the COLR. The specified boron concentration is controlled by plant procedures to maintain an overall core reactivity of  $k_{eff} \leq 0.95$  during fuel handling, with control rods and fuel assemblies assumed to be in the most adverse configuration (least negative reactivity).

GDC 26 of 10 CFR 50, Appendix A, requires that two independent reactivity control systems of different design principles be provided (Ref. 1). One of these systems must be capable of holding the reactor core subcritical under cold conditions. The Chemical and Volume Control System (CVCS) is the system capable of maintaining the reactor subcritical in cold conditions by maintaining the boron concentration (Ref. 2).

The reactor is brought to shutdown conditions before beginning operations to open the reactor vessel for refueling. After the RCS is cooled and depressurized, the vessel head is unbolted, and removed. The refueling cavity is then flooded with borated water from the refueling water storage tank through the open reactor vessel by gravity feeding or by the use of the Residual Heat Removal (RHR) System pumps.



BASES

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BACKGROUND (continued)

The pumping action of the RHR System in the RCS, and the natural circulation due to thermal driving heads in the reactor vessel and refueling cavity, ensure adequate mixing of the borated water. The RHR System is in operation during refueling (see LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level," and LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation—Low Water Level") to provide forced circulation in the RCS and assist in maintaining the boron concentration in the RCS, the refueling canal, and the refueling cavity above the COLR limit.

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APPLICABLE  
SAFETY ANALYSES

During refueling operations, the reactivity condition of the core is consistent with the initial conditions assumed for the boron dilution accident in the accident analysis (Ref. 3) and is conservative for MODE 6. The boron concentration limit specified in the COLR is based on the core reactivity at the beginning of each fuel cycle (the end of refueling) and includes an uncertainty allowance.

The required boron concentration and the plant refueling procedures that verify the correct fuel loading plan (including full core mapping) ensure that the  $k_{eff}$  of the core will remain  $\leq 0.95$  during the refueling operation. Hence, at least a 5%  $\Delta k/k$  margin of safety is established during refueling.

During refueling, all filled portions of the RCS, the water volume in the spent fuel pool, the transfer tube, the refueling canal, the refueling cavity, and the reactor vessel form a single mass. As a result, the soluble boron concentration is relatively the same in each of these volumes.

The limiting boron dilution accident analyzed occurs in MODE 5 (Ref. 3). A detailed discussion of this event is provided in Bases B 3.1.1, "SHUTDOWN MARGIN (SDM)."

The RCS boron concentration satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

## BASES

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LCO                      The LCO requires that a minimum boron concentration be maintained in all filled portions of the RCS, the refueling canal, and the refueling cavity, that are hydraulically coupled to the reactor core, while in MODE 6. The boron concentration limit specified in the COLR ensures that a core  $k_{eff}$  of  $\leq 0.95$  is maintained during fuel handling operations. Violation of the LCO could lead to an inadvertent criticality during MODE 6.

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APPLICABILITY        This LCO is applicable in MODE 6 to ensure that the fuel in the reactor vessel will remain subcritical. The required boron concentration ensures a  $k_{eff} \leq 0.95$ . In MODES 1 and 2 with  $k_{eff} \geq 1.0$ , LCO 3.1.4, "Rod Group Alignment Limits," LCO 3.1.5, "Shutdown Bank Insertion Limits," and LCO 3.1.6, "Control Bank Insertion Limits," ensure an adequate amount of negative reactivity is available to shutdown the reactor. In MODE 2 with  $k_{eff} < 1.0$  and MODES 3, 4, and 5, LCO 3.1.1, "SHUTDOWN MARGIN (SDM)," ensures that an adequate amount of negative reactivity is available to shut down the reactor and maintain it subcritical.

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ACTIONS                A.1, A.2, and A.3

Continuation of CORE ALTERATIONS or positive reactivity additions (including actions to reduce boron concentration) is contingent upon maintaining the unit in compliance with the LCO.

BASES

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ACTIONS (continued)

If the boron concentration of any coolant volume in the filled portions of the RCS, the refueling canal, or the refueling cavity is less than its limit, an inadvertent criticality may occur due to an incorrect fuel loading. To minimize the potential of an inadvertent criticality resulting from a fuel loading error, all operations involving CORE ALTERATIONS and positive reactivity additions must be suspended immediately.

Suspension of CORE ALTERATIONS and positive reactivity additions shall not preclude moving a component to a safe position, or heating or cooling the coolant volume for the purpose of system temperature control within established procedures.

In addition to immediately suspending CORE ALTERATIONS and positive reactivity additions, action to restore the boron concentration must be initiated immediately.

There are no safety analysis assumptions of boration flow rate and concentration that must be satisfied. The only requirement is to restore the boron concentration to its required value as soon as possible. In order to raise the boron concentration as soon as possible, the operator should begin boration with the best source available for unit conditions.

Once actions have been initiated, they must be continued until the boron concentration is restored. The restoration time depends on the amount of boron that must be injected to reach the required concentration.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.1.1

This SR ensures that the coolant boron concentration in all filled portions of the RCS, the refueling canal, and the refueling cavity, that are hydraulically coupled with the reactor core, is within the COLR limits. The boron concentration of the coolant in each volume is determined periodically by chemical analysis.

A Frequency of once every 72 hours is a reasonable amount of time to verify the boron concentration of representative samples. The Frequency is based on operating experience, which has shown 72 hours to be adequate to detect slow trends in boron concentration in these volumes prior to significant reduction.

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REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
2. UFSAR, Section 9.3.4.
3. UFSAR, Section 15.4.6.

BASES

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## B 3.9 REFUELING OPERATIONS

### B 3.9.2 Unborated Water Source Isolation Valves

#### BASES

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#### BACKGROUND

During MODE 6 operations, all isolation valves for reactor makeup water sources containing unborated water that are connected to the Reactor Coolant System (RCS) must be closed to prevent unplanned boron dilution of the reactor coolant. The isolation valves (CV111B, CV8428, CV8441, CV8435, and CV8439) must be secured in the closed position.

The Chemical and Volume Control System is capable of supplying borated and unborated water to the RCS through various flow paths. Since a positive reactivity addition made by reducing the boron concentration is inappropriate during MODE 6, isolation of all unborated water sources prevents an unplanned boron dilution.

The Refueling Water Storage Tank (RWST) is assumed to be a boration source. With the RWST boron concentration not satisfying these assumptions, the RWST becomes a potential dilution source and valves CV112D and CV112E are considered unborated water source isolation valves. These valves must be secured in the closed position.

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#### APPLICABLE SAFETY ANALYSES

The possibility of an uncontrolled boron dilution event (Ref. 1) occurring during MODE 6 refueling operations is precluded by adherence to this LCO, which requires that potential dilution sources be isolated. Closing the required valves during refueling operations prevents the flow of unborated water to the filled portion of the RCS. The valves are used to isolate unborated water sources. These valves have the potential to indirectly allow dilution of the RCS boron concentration in MODE 6. By isolating unborated water sources, a safety analysis for an uncontrolled boron dilution accident in accordance with the Standard Review Plan (Ref. 2) is not required for MODE 6.

The RCS unborated water source isolation valves satisfy Criterion 2 of 10 CFR 50.36(c)(2)(ii).

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BASES

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LCO                      This LCO requires that flow paths to the RCS from unborated water sources be isolated to prevent unplanned boron dilution during MODE 6 and thus avoid a reduction in SDM.

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APPLICABILITY        In MODE 6, this LCO is applicable to prevent an inadvertent boron dilution event by ensuring isolation of all sources of unborated water to the RCS.

For all other MODES, the boron dilution accident was analyzed and was found to be capable of being mitigated.

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ACTIONS                The ACTIONS table has been modified by a Note that allows separate Condition entry for each unborated water source isolation valve.

A.1, A.2, and A.3

Continuation of CORE ALTERATIONS is contingent upon maintaining the unit in compliance with this LCO. With any valve used to isolate unborated water sources not secured in the closed position, all operations involving CORE ALTERATIONS must be suspended immediately. The Completion Time of "immediately" for performance of Required Action A.1 shall not preclude completion of movement of a component to a safe position.

Preventing inadvertent dilution of the reactor coolant boron concentration is dependent on maintaining the unborated water isolation valves secured closed. Securing the valves in the closed position ensures that the valves cannot be inadvertently opened. The Completion Time of "immediately" requires an operator to initiate actions to close an open valve and secure the isolation valve in the closed position without delay. Once actions are initiated, they must be continued until the valves are secured in the closed position.

BASES

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ACTIONS (continued)

Due to the potential of having diluted the boron concentration of the reactor coolant, SR 3.9.1.1 (verification of boron concentration) must be performed whenever Condition A is entered to demonstrate that the required boron concentration exists. The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration.

Condition A has been modified by a Note to require that Required Action A.3 be completed whenever Condition A is entered.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.2.1

These valves are to be secured closed to isolate possible dilution paths. The likelihood of a significant reduction in the boron concentration during MODE 6 operations is remote due to the large mass of borated water in the refueling cavity and the fact that all unborated water sources are isolated, precluding a dilution. The boron concentration is checked every 72 hours during MODE 6 under SR 3.9.1.1. This SR demonstrates that valves CV111B, CV8428, CV8441, CV8435, and CV8439 are secured closed by the use of mechanical stops, removal of air, or removal of electrical power. Verification of the secured valve position through a system walkdown ensures the isolation of possible dilution paths. The 31 day Frequency is based on engineering judgment and is considered reasonable in view of other administrative controls that will ensure that the valve opening is an unlikely possibility.

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REFERENCES

1. UFSAR, Section 15.4.6.
2. NUREG-0800, Section 15.4.6.



BASES

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## B 3.9 REFUELING OPERATIONS

### B 3.9.3 Nuclear Instrumentation

#### BASES

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##### BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors are part of the Nuclear Instrumentation System (NIS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core. The use of portable detectors is permitted, provided the LCO requirements are met.

The installed source range neutron flux monitors are boron trifluoride detectors operating in the proportional region of the gas filled detector characteristic curve. The detectors monitor the neutron flux in counts per second. The instrument range covers six decades (1E+6 cps) with a 7% instrument accuracy (Ref. 1). The detectors also provide continuous visual indication in the control room to alert operators to a possible dilution accident. The NIS is designed in accordance with the criteria presented in Reference 2. If used, portable detectors must be functionally equivalent to the installed NIS source range monitors.

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##### APPLICABLE SAFETY ANALYSES

Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as with a boron dilution accident (Ref. 3) or an improperly loaded fuel assembly. The need for a safety analysis for an uncontrolled boron dilution accident is eliminated by isolating all unborated water sources as required by LCO 3.9.2, "Unborated Water Source Isolation Valves."

The source range neutron flux monitors satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

## BASES

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LCO                      This LCO requires that two source range neutron flux monitors be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity. To be OPERABLE, each monitor must provide visual indication.

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APPLICABILITY        In MODE 6, the source range neutron flux monitors must be OPERABLE to determine changes in core reactivity. There are no other direct means available to check core reactivity levels. In MODE 2 below the intermediate range neutron flux interlock setpoint (P-6), and in MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal or with all rods not fully inserted, the installed source range neutron flux monitors are required to be OPERABLE by LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation."

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## ACTIONS

### A.1 and A.2

With only one source range neutron flux monitor OPERABLE, redundancy has been lost. Since these instruments are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action A.1 or A.2 shall not preclude completion of movement of a component to a safe position or normal heatup/cooldown of the coolant volume for the purpose of system temperature control.

### B.1 and B.2

With no source range neutron flux monitor OPERABLE, there are no direct means of detecting changes in core reactivity. Therefore, action to restore a monitor to OPERABLE status shall be initiated immediately and continued until a source range neutron flux monitor is restored to OPERABLE status.

BASES

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ACTIONS (continued)

Since CORE ALTERATIONS and positive reactivity additions are not to be made, the core reactivity condition is stabilized until the source range neutron flux monitors are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of once per 12 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration and ensures that unplanned changes in boron concentration would be identified. The 12 hour Frequency is reasonable, considering the low probability of a change in core reactivity during this time period.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.3.1

SR 3.9.3.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1.

SR 3.9.3.2

SR 3.9.3.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consists of obtaining the detector discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

BASES

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REFERENCES

1. UFSAR, Table 7.5-2.
2. 10 CFR 50, Appendix A, GDC 13, GDC 26, GDC 28, and GDC 29.
3. UFSAR, Section 15.4.6.

## B 3.9 REFUELING OPERATIONS

### B 3.9.4 Containment Penetrations

#### BASES

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#### BACKGROUND

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, a release of fission product radioactivity within containment will be restricted from escaping to the environment when the LCO requirements are met. In MODES 1, 2, 3, and 4, this is accomplished by maintaining containment OPERABLE as described in LCO 3.6.1, "Containment." In MODES 5 and 6, the potential for containment pressurization as a result of an accident is not likely; therefore, requirements to isolate the containment from the outside atmosphere can be less stringent. The LCO requirements are referred to as "containment closure" rather than "containment OPERABILITY." Containment closure means that all potential escape paths are filtered, closed, or capable of being closed. Since there is no significant potential for containment pressurization, the 10 CFR 50, Appendix J, leakage criteria and tests are not required.

The containment serves to contain fission product radioactivity that may be released from the reactor core following an accident, such that offsite radiation exposures are maintained well within the requirements of 10 CFR 100. In addition, the containment provides radiation shielding from the fission products that may be present in the containment atmosphere following accident conditions.

BASES

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BACKGROUND (continued)

The containment equipment hatch, which is part of the containment pressure boundary, provides a means for moving large equipment and components into and out of containment. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment with the equipment hatch installed, the equipment hatch must be held in place by at least four bolts. Good engineering practice dictates that the bolts be approximately equally spaced. During CORE ALTERATIONS or movements of irradiated fuel assemblies within containment and the equipment hatch not intact, the OPERABILITY requirements of the Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System must be met. The OPERABILITY requirements of the FHB Ventilation System are provided in LCO 3.7.13, "Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System."

The containment air locks, which are also part of the containment pressure boundary, provide a means for personnel access during MODES 1, 2, 3, and 4 in accordance with LCO 3.6.2, "Containment Air Locks." The two air locks are the personnel air lock and the emergency air lock. Each air lock has a door at both ends. The doors are normally interlocked to prevent simultaneous opening when containment OPERABILITY is required. During periods of unit shutdown when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, containment closure is required; therefore, the door interlock mechanism may remain disabled, but one air lock door must always remain closed. An exception, however, is provided for the personnel air lock. It is acceptable to have both doors of the personnel air lock opened simultaneously provided the FHB Ventilation System is in compliance with LCO 3.7.13.

The closure restrictions are sufficient to restrict unfiltered fission product radioactivity releases from containment to the environment due to a fuel handling accident during refueling.

BASES

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BACKGROUND (continued)

The Containment Ventilation Isolation System consists of the normal purge subsystem, the mini purge subsystem, and the post Loss Of Coolant Accident purge subsystem. These three subsystems contain penetrations which provide direct access from the containment to the outside atmosphere. In MODE 6, the minipurge subsystem is normally used to exchange large volumes of containment air to support refueling operations. Each penetration contains inside and outside containment isolation valves which close automatically on an actuation signal. During CORE ALTERATIONS or movement of irradiated fuel within containment, all required valves within a subsystem must be capable of being closed by a containment ventilation isolation signal whenever the associated subsystem is in operation. A list of the instrumentation which functions to isolate the valves in these penetrations is provided in LCO 3.3.6, "Containment Ventilation Isolation Instrumentation."

The other containment penetrations that provide direct access from containment atmosphere to outside atmosphere must be isolated on at least one side. Isolation may be achieved by a closed automatic isolation valve, a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods allowed under the provisions of 10 CFR 50.59 may include use of a material that can provide a temporary atmospheric pressure ventilation barrier during CORE ALTERATIONS or movement of irradiated fuel within the containment.



BASES

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APPLICABLE  
SAFETY ANALYSES

During CORE ALTERATIONS or movement of irradiated fuel assemblies within containment, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel (Ref. 1). Fuel handling accidents, analyzed in Reference 2, include dropping a single irradiated fuel assembly and handling tool or a heavy object onto other irradiated fuel assemblies. The requirements of LCO 3.9.7, "Refueling Cavity Water Level," and the minimum decay time of 100 hours prior to CORE ALTERATIONS ensure that the release of fission product radioactivity, subsequent to a fuel handling accident in containment, results in doses that are well within the guideline values specified in 10 CFR 100. Reference 2 defines "well within" 10 CFR 100 to be 25% or less of the 10 CFR 100 values. The acceptance limits for offsite radiation exposure for the fuel handling accident will be 25% of 10 CFR 100 values or the NRC staff approved licensing basis (e.g., a specified fraction of 10 CFR 100 limits).

Containment penetrations satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

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LCO

This LCO limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge (supply and exhaust) penetrations. For the OPERABLE containment purge penetrations, this LCO ensures that unisolated penetrations are isolable by the Containment Ventilation Isolation System. The OPERABILITY requirements for this LCO ensure the automatic purge valve closure times specified in the UFSAR can be achieved and, therefore, meet the assumptions used in the safety analysis to ensure that releases through the valves are terminated, such that radiological doses are within the acceptance limit.

BASES

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LCO (continued)

The LCO is modified by a Note which allows both personnel air lock doors to be open or the equipment hatch not intact when the FHB Ventilation System is in compliance with LCO 3.7.13. When the equipment hatch is installed it serves to contain fission product radioactivity that may be released following a fuel handling accident in the containment. When the equipment hatch is not intact, or when both doors of the personnel air lock are simultaneously opened, the internal containment pressure is essentially equal to the internal pressure of the fuel handling building. In the event of a fuel handling accident in the containment, realigning of the fuel handling building ventilation system creates a negative pressure in the containment and fuel handling building relative to the auxiliary building and outside atmosphere. The negative pressure ensures that any radioactivity released to the containment atmosphere will either remain in the containment or be filtered through a FHB Ventilation System train. As such, with the equipment hatch not intact, or with both personnel air lock doors open, the consequences of a fuel handling accident in containment would not exceed those calculated for a fuel handling accident in the fuel handling building.

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APPLICABILITY

The containment penetration requirements are applicable during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment because this is when there is a potential for a fuel handling accident. In MODES 1, 2, 3, and 4, containment penetration requirements are addressed by LCO 3.6.1. In MODE 5, and in MODE 6 when CORE ALTERATIONS or movement of irradiated fuel assemblies within containment are not being conducted, the potential for a fuel handling accident does not exist. Therefore, under these conditions no requirements are placed on containment penetration status.

BASES

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ACTIONS                    A.1 and A.2

If the containment equipment hatch, air lock doors, or any containment penetration that provides direct access from the containment atmosphere to the outside atmosphere is not in the required status, the unit must be placed in a condition where containment closure is not needed. This is accomplished by immediately suspending CORE ALTERATIONS and movement of irradiated fuel assemblies within containment. Performance of these actions shall not preclude completion of movement of a component to a safe position.

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SURVEILLANCE  
REQUIREMENTS            SR 3.9.4.1

This Surveillance demonstrates that each of the containment penetrations required to be isolated is isolated. This Surveillance for the open purge valves demonstrates that the valves are not blocked from closing. Also the Surveillance will demonstrate that each valve operator has motive power which will ensure that each valve is capable of being closed by an OPERABLE automatic Containment Ventilation Isolation signal.

The Surveillance is performed every 7 days during CORE ALTERATIONS or movement of irradiated fuel assemblies within containment. The Surveillance interval is selected to be commensurate with the normal duration of time to complete fuel handling operations. As such, this Surveillance ensures that a postulated fuel handling accident that releases fission product radioactivity within the containment will not result in a release of fission product radioactivity to the environment.

BASES

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SURVEILLANCE REQUIREMENTS (continued)

SR 3.9.4.2

This Surveillance demonstrates that each required containment purge valve actuates to its isolation position on an actual or simulated high radiation signal. The 18 month Frequency maintains consistency with other similar Engineered Safety Feature Actuation System instrumentation and valve testing requirements. In LCO 3.3.6, the Containment Ventilation Isolation instrumentation requires a CHANNEL CHECK every 12 hours and a COT every 92 days to ensure the channel OPERABILITY during refueling operations. Every 18 months a CHANNEL CALIBRATION is performed. SR 3.9.4.3 demonstrates that the isolation time of each valve is in accordance with the Inservice Testing Program requirements. These Surveillances performed during MODE 6 will ensure that the valves are capable of closing after a postulated fuel handling accident to limit a release of fission product radioactivity from the containment.

SR 3.9.4.3

This Surveillance demonstrates that the isolation time of each required containment purge valve providing direct access from the containment atmosphere to the outside atmosphere is in accordance with the Inservice Testing Program requirements. This SR, along with SR 3.9.4.2, ensures the containment purge valves in penetrations which provide direct access from the containment atmosphere to the outside atmosphere are capable of closing after a postulated fuel handling accident to limit the release of fission product radioactivity from the containment.

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REFERENCES

1. UFSAR, Section 15.7.4.
2. NUREG-0800, Section 15.7.4, Rev. 1, July 1981.

BASES

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## B 3.9 REFUELING OPERATIONS

### B 3.9.5 Residual Heat Removal (RHR) and Coolant Circulation—High Water Level

#### BASES

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##### BACKGROUND

The purpose of the RHR System in MODE 6 is to remove decay heat and sensible heat from the Reactor Coolant System (RCS), as required by GDC 34, to provide mixing of borated coolant and to prevent boron stratification (Ref. 1). Heat is removed from the RCS by circulating reactor coolant through the RHR heat exchanger(s), where the heat is transferred to the Component Cooling Water System. The coolant is then returned to the RCS via the RCS cold leg(s). Operation of the RHR System for normal cooldown or decay heat removal is manually accomplished from the control room. The heat removal rate is adjusted by controlling the flow of reactor coolant through the RHR heat exchanger(s) and bypass line(s). Mixing of the reactor coolant is maintained by this continuous circulation of reactor coolant through the RHR System.

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##### APPLICABLE SAFETY ANALYSIS

While there is no explicit analysis assumption for the decay heat removal function of the RHR System in MODE 6, if the reactor coolant temperature is not maintained below 200°F, boiling of the reactor coolant could result. This could lead to a loss of coolant in the reactor vessel. In addition, boiling of the reactor coolant could lead to a reduction in boron concentration in the coolant due to boron plating out on components near the areas of the boiling activity. The loss of reactor coolant and the reduction of boron concentration in the reactor coolant would eventually challenge the integrity of the fuel cladding, which is a fission product barrier. One train of the RHR System is required to be OPERABLE and in operation in MODE 6, with the water level  $\geq$  23 ft above the top of the reactor vessel flange, to prevent this challenge. The LCO does permit de-energizing the RHR pump for short durations, under the condition that the boron concentration is not reduced. This conditional de-energizing of the RHR pump does not result in a challenge to the fission product barrier.

RHR and Coolant Circulation—High Water Level satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

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## BASES

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### LCO

Only one RHR loop is required for decay heat removal in MODE 6, with the water level  $\geq$  23 ft above the top of the reactor vessel flange because the volume of water above the reactor vessel flange provides backup decay heat removal capability. One RHR loop is required to be in operation and OPERABLE to provide:

- a. Removal of decay heat;
- b. Mixing of borated coolant to minimize the possibility of criticality; and
- c. Indication of reactor coolant temperature.

An OPERABLE RHR loop includes an RHR pump, a heat exchanger, valves, piping, instruments, and controls to ensure an OPERABLE flow path. The flow path starts in one of the RCS hot legs and is returned to the RCS cold legs.

The LCO is modified by a Note that allows the required operating RHR loop to be removed from service for up to 1 hour per 8 hour period, provided no operations are permitted that would cause a reduction of the RCS boron concentration. Boron concentration reduction is prohibited because uniform concentration distribution cannot be ensured without forced circulation. This permits operations such as core mapping or alterations in the vicinity of the reactor vessel hot leg nozzles and RCS to RHR isolation valve testing. During this 1 hour period, decay heat is removed by natural convection to the large mass of water in the refueling cavity.

## BASES

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**APPLICABILITY** One RHR loop must be OPERABLE and in operation in MODE 6, with the water level  $\geq$  23 ft above the top of the reactor vessel flange, to provide decay heat removal and mixing of the borated coolant. The 23 ft water level was selected because it corresponds to the 23 ft requirement established for fuel movement in LCO 3.9.7, "Refueling Cavity Water Level." Requirements for the RHR System in MODES 1, 2, 3, 4, and 5 are covered by LCO 3.4.6, "RCS Loops-MODE 4," LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled," LCO 3.4.8, "RCS Loops-MODE 5, Loops Not Filled," LCO 3.5.2, "ECCS-Operating," and LCO 3.5.3, "ECCS-Shutdown." RHR loop requirements in MODE 6 with the water level  $<$  23 ft are located in LCO 3.9.6, "Residual Heat Removal (RHR) and Coolant Circulation-Low Water Level."

---

## ACTIONS A.1, A.2, A.3, and A.4

If RHR loop requirements are not met, there will be no forced circulation to provide mixing to establish uniform boron concentrations. Reduced boron concentrations can occur by the addition of water with a lower boron concentration than that contained in the RCS. Therefore, actions that could result in a reduction in the coolant boron concentration must be suspended immediately.

With no forced circulation cooling, decay heat removal from the core occurs by natural convection to the heat sink provided by the water above the core. A minimum refueling water level of 23 ft above the reactor vessel flange provides an adequate available heat sink. Suspending any operation that would increase decay heat load, such as loading a fuel assembly, is a prudent action under this condition. Therefore, actions shall be taken immediately to suspend loading of irradiated fuel assemblies in the core. Suspension of these activities shall not preclude completion of movement of a component to a safe condition.

With the unit in MODE 6 and the refueling water level  $\geq$  23 ft above the top of the reactor vessel flange, removal of decay heat is by ambient losses only. Therefore, corrective actions shall be initiated immediately and shall continue until the RHR loop requirements are met.



BASES

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ACTIONS (continued)

With the RHR loop requirements not met, the potential exists for the coolant to boil and release radioactive gas to the containment atmosphere. Therefore, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere must be closed within 4 hours. Closing containment penetrations that are open to the outside atmosphere ensures dose limits are not exceeded.

The Completion Time of 4 hours is reasonable, based on the low probability of the coolant boiling in that time.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.5.1

This Surveillance demonstrates that the RHR loop is in operation and circulating reactor coolant. The flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability and to provide mixing of the boric acid coolant to prevent thermal and boron stratification in the core. The Frequency of 12 hours is sufficient, considering the flow, temperature, pump control, and alarm indications available to the operator in the control room for monitoring the RHR System.

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REFERENCES

1. UFSAR, Section 5.4.7.

## B 3.9 REFUELING OPERATIONS

### B 3.9.6 Residual Heat Removal (RHR) and Coolant Circulation-Low Water Level

#### BASES

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##### BACKGROUND

The purpose of the RHR System in MODE 6 is to remove decay heat and sensible heat from the Reactor Coolant System (RCS), as required by GDC 34, to provide mixing of borated coolant, and to prevent boron stratification (Ref. 1). Heat is removed from the RCS by circulating reactor coolant through the RHR heat exchangers where the heat is transferred to the Component Cooling Water System. The coolant is then returned to the RCS via the RCS cold leg(s). Operation of the RHR System for normal cooldown decay heat removal is manually accomplished from the control room. The heat removal rate is adjusted by controlling the flow of reactor coolant through the RHR heat exchanger(s) and bypass line(s). Mixing of the reactor coolant is maintained by this continuous circulation of reactor coolant through the RHR System.

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##### APPLICABLE SAFETY ANALYSIS

While there is no explicit analysis assumption for the decay heat removal function of the RHR System in MODE 6, if the reactor coolant temperature is not maintained below 200°F, boiling of the reactor coolant could result. This could lead to a loss of coolant in the reactor vessel. In addition, boiling of the reactor coolant could lead to a reduction in boron concentration in the coolant due to the boron plating out on components near the areas of the boiling activity. The loss of reactor coolant and the reduction of boron concentration in the reactor coolant will eventually challenge the integrity of the fuel cladding, which is a fission product barrier. Two trains of the RHR System are required to be OPERABLE, and one train in operation, in order to prevent this challenge.

RHR and Coolant Circulation-Low Water Level satisfies Criterion 4 of 10 CFR 50.36(c)(2)(ii).

## BASES

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### LCO

Both RHR loops must be OPERABLE in MODE 6, with the water level < 23 ft above the top of the reactor vessel flange. In addition, one RHR loop must be in operation in order to provide:

- a. Removal of decay heat;
- b. Mixing of borated coolant to minimize the possibility of criticality; and
- c. Indication of reactor coolant temperature.

An OPERABLE RHR loop consists of an RHR pump, a heat exchanger, valves, piping, instruments and controls to ensure an OPERABLE flow path. The flow path starts in one of the RCS hot legs and is returned to the RCS cold legs. However, the LCO is modified by a Note that permits the required RHR loop to be removed from operation and considered OPERABLE when aligned to, or during transitioning to or from, the Refueling Water Storage Tank (RWST) to support filling or draining the refueling cavity, or to support required testing, if capable of being realigned to the RCS.

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### APPLICABILITY

Two RHR loops are required to be OPERABLE, and one RHR loop must be in operation in MODE 6, with the water level < 23 ft above the top of the reactor vessel flange, to provide decay heat removal and mixing of the borated coolant. Requirements for the RHR System in MODES 1, 2, 3, 4, and 5 are covered by LCO 3.4.6, "RCS Loops—MODE 4," LCO 3.4.7, "RCS Loops—MODE 5, Loops Filled," LCO 3.4.8, "RCS Loops—MODE 5, Loops Not Filled," LCO 3.5.2, "ECCS—Operating," and LCO 3.5.3, "ECCS—Shutdown." RHR loop requirements in MODE 6 with the water level  $\geq$  23 ft are located in LCO 3.9.5, "Residual Heat Removal (RHR) and Coolant Circulation—High Water Level."

BASES

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ACTIONS

A.1 and A.2

With one or more RHR loops inoperable, the RHR System may not be capable of removing decay heat and mixing the borated coolant. Therefore, action shall be immediately initiated and continued until the required number of RHR loops are restored to OPERABLE status or until  $\geq 23$  ft of water level is established above the reactor vessel flange. When the water level is  $\geq 23$  ft above the reactor vessel flange, the Applicability changes to that of LCO 3.9.5, and only one RHR loop is required to be OPERABLE and in operation. An immediate Completion Time is necessary for an operator to initiate corrective actions.

B.1, B.2, and B.3

If no RHR loop is in operation, there will be no forced circulation to provide mixing to establish uniform boron concentrations. Reduced boron concentrations can occur by the addition of water with a lower boron concentration than that contained in the RCS. Therefore, actions that would result in a reduction in the coolant boron concentration must be suspended immediately.

In addition, with no forced circulation, any decay heat removal occurs by ambient losses only. Therefore, action shall be initiated immediately to restore one RHR loop to operation. Once initiated, actions shall continue until one RHR loop has been restored to operation.

BASES

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ACTIONS (continued)

With no RHR loop in operation, the potential exists for the coolant to boil and release radioactive gas to the containment atmosphere. Therefore, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere must be closed within 4 hours. Closing containment penetrations that are open to the outside atmosphere ensures that dose limits are not exceeded.

The Completion Time of 4 hours is reasonable, based on the low probability of the coolant boiling in that time.

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.6.1

This Surveillance demonstrates that one RHR loop is in operation and circulating reactor coolant. The flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability and to provide mixing of the borated coolant to prevent thermal and boron stratification in the core. The Frequency of 12 hours is sufficient, considering the flow, temperature, pump control, and alarm indications available to the operator for monitoring the RHR System in the control room.

SR 3.9.6.2

Verification that the required pump is OPERABLE ensures a RHR pump can be placed in operation, if needed, to maintain decay heat removal and borated coolant circulation. Verification is performed by verifying proper breaker alignment and power available to the pump. The Frequency of 7 days is considered reasonable in view of other administrative controls available and has been shown to be acceptable by operating experience.

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REFERENCES

1. UFSAR, Section 5.4.7.

## B 3.9 REFUELING OPERATIONS

### B 3.9.7 Refueling Cavity Water Level

#### BASES

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##### BACKGROUND

The movement of irradiated fuel assemblies within containment or performance of CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts, requires a minimum water level of 23 ft above the top of the reactor vessel flange. This requirement ensures a sufficient level of water is maintained in the refueling cavity to retain iodine fission product activity resulting from a fuel handling accident in containment (Refs. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to < 25% of 10 CFR 100 limits, as provided by the guidance of Reference 3.

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##### APPLICABLE SAFETY ANALYSES

During CORE ALTERATIONS and movement of irradiated fuel assemblies, the water level in the refueling cavity is an initial condition design parameter in the analysis of a fuel handling accident in containment, as postulated by Regulatory Guide 1.25 (Ref. 1). A minimum water level of 23 ft (Regulatory Position C.1.c of Ref. 1) allows a decontamination factor of 100 (Regulatory Position C.1.g of Ref. 1) to be used in the accident analysis for iodine. This relates to the assumption that 99% of the total iodine released from the pellet to cladding gap of all the dropped fuel assembly rods is retained by the refueling cavity water. The fuel pellet to cladding gap is assumed to contain 10% of the total fuel rod iodine and noble gas inventory, with the exception of 30% for Kr-85 (Ref. 2).

The fuel handling accident analysis inside containment is described in Reference 2. With a minimum water level of 23 ft and a minimum decay time of 100 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling accident is adequately captured by the water and offsite doses are maintained within allowable limits (Refs. 4 and 5).

Refueling cavity water level satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

BASES

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LCO                      A minimum refueling cavity water level of 23 ft above the reactor vessel flange is required to ensure that the radiological consequences of a postulated fuel handling accident inside containment are within acceptable limits.

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APPLICABILITY        LCO 3.9.7 is applicable during CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts, and when moving irradiated fuel assemblies within containment. The LCO ensures a sufficient level of water is present in the refueling cavity to minimize the radiological consequences of a fuel handling accident in containment. If irradiated fuel assemblies are not present in containment, there can be no significant radioactivity release as a result of a postulated fuel handling accident. Requirements for fuel handling accidents in the spent fuel pool are covered by LCO 3.7.14, "Spent Fuel Pool Water Level."

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ACTIONS                A.1 and A.2

With a water level of < 23 ft above the top of the reactor vessel flange, all operations involving CORE ALTERATIONS or movement of irradiated fuel assemblies within the containment shall be suspended immediately to ensure that a fuel handling accident cannot occur.

The suspension of CORE ALTERATIONS and fuel movement shall not preclude completion of movement of a component to a safe position.

BASES

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SURVEILLANCE  
REQUIREMENTS

SR 3.9.7.1

Verification of a minimum water level of 23 ft above the top of the reactor vessel flange ensures that the design basis for the analysis of the postulated fuel handling accident during refueling operations is met. Water at the required level above the top of the reactor vessel flange limits the consequences of damaged fuel rods that are postulated to result from a fuel handling accident inside containment (Ref. 2).

The Frequency of 24 hours is based on engineering judgment and is considered adequate in view of the large volume of water and the normal procedural controls of valve positions, which make significant unplanned level changes unlikely.

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REFERENCES

1. Regulatory Guide 1.25, March 23, 1972.
2. UFSAR, Section 15.7.4.
3. NUREG-0800, Section 15.7.4.
4. 10 CFR 100.10.
5. Malinowski, D. D., Bell, M. J., Duhn, E., and Locante, J., WCAP-7828, Radiological Consequences of a Fuel Handling Accident, December 1971.



BASES

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**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 1.0, Use and Application</b>			
1.0 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 1.0	Section 1.0
1.0 A2	The inclusion of an actual signal as an acceptable signal input was added to the definitions of Analog Channel Operational Test and Actuation Logic Test, and the word "Analog" was deleted from the term Analog Channel Operational Test. These changes are administrative because they only clarify existing instrumentation test practices.	1.1	1.2 , 1.3
1.0 A3	The concept of "required" components associated with a TS channel was included in the definitions of Analog Channel Operational Test, Channel Calibration, and Trip Actuating Device Operational Test since all channels do not have the same functions necessary to perform their safety function. These changes are administrative because they only clarify existing instrumentation test practices.	1.1	1.3, 1.5, 1.36
1.0 A4	Revised the definition of Channel Calibration to clarify that resistance temperature detectors (RTDs) and thermocouples are not subject to normal calibration because they have a fixed input/output response which cannot be adjusted. This change is administrative because it only clarifies existing instrumentation test practices.	1.1	1.5
1.0 A5	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific

Byron and Braidwood

A\_TBL1.0

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
1.0 A6	The definition of Controlled Leakage was replaced by the requirements for reactor coolant pump (RCP) seal water flow in ITS 3.5.5. Accordingly, the definitions of Identified Leakage and Unidentified Leakage were clarified to exclude RCP seal water flow.	1.1, 3.5.5	1.8, 1.15, 1.37
1.0 A7	The word "conservative" was deleted from the definition of Core Alteration to eliminate redundancy and confusion with the term "safe."	1.1	1.9
1.0 A8	The definitions of Digital Channel Operational Test, Member(s) of the Public, Process Control Program, Purge - Purging, Reportable Event, Site Boundary, Source Check, Unrestricted Area, Ventilation Exhaust Treatment System, Venting, and Waste Gas Holdup System were omitted from the ITS because these terms are not used in ITS.	N/A	1.10, 1.17, 1.23, 1.24, 1.28, 1.30, 1.33, 1.38, 1.39, 1.40, 1.41
1.0 A9	The definition of Frequency Notation and Table 1.1 were omitted from the ITS because these notations are not used in ITS.	N/A	1.14, Table 1.1
1.0 A10	The definitions of Identified Leakage, Pressure Boundary Leakage, and Unidentified Leakage were combined into the term "Leakage".	1.1	1.15, 1.22, 1.37
1.0 A11	The definition of Operable - Operability was clarified to be more specific regarding electrical power and functional requirements for declaring operability.	1.1	1.19
1.0 A12	The definition of Operational Mode - Mode was revised to include reactor vessel head closure bolt tensioning as a defining attribute and to exclude any condition in which fuel is not in the reactor vessel.	1.1, Table 1.1-1	1.20, Table 1.2

(By) - Byron specific  
(Bw) - Braidwood specific

Byron and Braidwood

A\_TBL1.0

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
1.0 A13	Not used.		
1.0 A14	The definition of Staggered Test Basis has been revised such that the surveillance interval specified in the Surveillance Frequency multiplied by the total number of components in the associated function is the frequency each component is tested. This change is administrative because this change does not alter the surveillance test interval of components subject to staggered testing.	1.1	1.34
1.0 A15	Not used.		
1.0 A16	The notation for Refueling Mode was revised consistent with the ITS definition of Mode and by removing an unnecessary phrase regarding vessel head status.	Table 1.1-1	Table 1.2
1.0 A17	The % Rated Thermal Power attribute for Modes 3, 4, 5, and 6 were changed from "0" to "N/A" and the Average Coolant Temperature attribute for Modes 1 and 2 were changed from " $\geq 350^{\circ}\text{F}$ " to "N/A" to remove unnecessary information.	Table 1.1-1	Table 1.2
1.0 A18	STS Sections 1.2, 1.3, and 1.4 were adopted to provided guidance on the use of the ITS format, presentation, and conventions regarding logical connectors, completion times, and surveillance frequencies.	Sections 1.2, 1.3, and 1.4	N/A
1.0 A19	The definition of Shutdown Margin (SDM) was revised to include the requirement to account for the reactivity worth of any rod cluster control assembly (RCCA) incapable of being fully inserted. This requirement was moved from the CTS surveillances for determining SDM.	1.1	1.29, 4.1.1.1.1.a, 4.1.1.2.a

(By) - Byron specific  
(Bw) - Braidwood specific

Byron and Braidwood

A\_TBL1.0

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
1.0 A20	The definition of E-Bar - Average Disintegration Energy was revised to include the requirement to use at least 95% of the total non-iodine activity with half-lives greater than 10 minutes in the calculation. This requirement was moved from the CTS table which specifies requirements on reactor coolant specific activity.	1.1	1.12, Table 4.4-4 Notation ***
1.0 A21	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific

Byron and Braidwood

A\_TBL1.0

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 1.0, Use and Application</b>				
1.0 L1	The definition of Core Alterations was relaxed from movement or manipulation of "any" component within the reactor vessel to specify those components which can affect core reactivity. This change provides operational flexibility while continuing to prevent or mitigate a reactivity excursion event.	1.1	1.9	II
1.0 L2	The definitions of Engineered Safety Features (ESF) Response Time and Reactor Trip System Response Time were revised to allow these response times to be measured by means of any sequential, overlapping, or total steps so that the entire response time is measured. Allowing the response time tests to be performed in steps provides additional flexibility when compared to the literal words of the CTS definition. Also, approved methodology may be used to verify response times in lieu of measurement for selected components.	1.1	1.13, 1.27	V
1.0 L3	Not used.			

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
ITS Section 1.0, Use and Application					
None					

Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 1.0, Use and Application</b>			
1.0 M1	The definition of Shutdown Margin was revised to assume that, in Modes 1 and 2, the fuel and moderator temperatures are changed to the hot zero power temperature to account for the power defect due to shutting down the reactor.	1.1	1.29
1.0 M2	The definitions of Hot Shutdown and Cold Shutdown were revised regarding head closure status to eliminate Mode overlap when coolant temperature is $\geq 140^{\circ}\text{F}$ . Also, the coolant temperature and reactivity conditions for Refueling Mode were changed to "N/A" to eliminate the potential for applying less restrictive Mode requirements under certain plant conditions.	Table 1.1-1	Table 1.2

(By) - Byron specific  
(Bw) - Braidwood specific



**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 2.0, Safety Limits</b>			
2.0 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 2.0	Section 2.0
2.0 A2	The reference to four loop operation was removed from the Reactor Core Safety Limits (SLs) since the plant is only licensed to operate in this configuration.	2.1.1	2.1.1
2.0 A3	The SL Actions have been reformatted as SL Violations and conditions redundant to the SL requirements have been deleted.	2.2	2.1.1 Actions, 2.1.2 Actions
2.0 A4(Bw)	Deleted historical references to Figure 2.1-1a denoting reactor core safety limits for previous fuel cycles which are no longer applicable.	2.1.1, Figure 2.1.1-1	2.1.1, Figure 2.1-1a
2.0 A4(By)	Deleted historical references to Figure 2.1-1 denoting reactor core safety limits for previous fuel cycles which are no longer applicable.	2.1.1, Figure 2.1.1-1	2.1.1, Figure 2.1-1

(By) - Byron specific  
(Bw) - Braidwood specific

Byron and Braidwood

LA\_TBL2.0

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 2.0, Safety Limits</b>				
None				

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
 (Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 2.0, Safety Limits</b>					
2.0 LA1	SL Action 2.1.1, SL Action 2.1.2, 6.7.1.a	Notification to the NRC within 1 hour following violation of a safety limit (SL).	TRM	§50.59	3
2.0 LA2	SL Action 2.1.1, SL Action 2.1.2, 6.7.1.a	Notification to the Site Vice President and the Offsite Review and Investigative Function within 24 hours following violation of an SL.	QA Manual	§50.54(a)	3
2.0 LA3	SL Action 2.1.1, SL Action 2.1.2, 6.7.1.b, 6.7.1.c	Preparation , review, and submittal of a Safety Limit Violation Report within 14 days to the NRC, appropriate management personnel, and plant safety committees following an SL violation.	TRM	§50.59	3
2.0 LA4	SL Action 2.1.1, SL Action 2.1.2, 6.7.1.d	Authorization by the NRC prior to recommencing critical operation of the unit.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific

(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
<b>ITS Section 2.0, Safety Limits</b>			
None			

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.0, LCO and SR Applicability</b>			
3.0 A1	The phrase "...except as provided in LCO 3.0.2 and LCO 3.0.7" was added to clarify the concept of meeting Required Actions when an LCO is not met. The phrase "...upon failure to meet the Limiting Conditions for Operation, the associated Action requirements shall be met" was moved to LCO 3.0.2 to clarify the start of Completion Times.	LCO 3.0.1	3.0.1
3.0 A2	The phrase regarding noncompliance with a Specification is now addressed in LCO 3.0.3. Phrases "associated Action requirements," "time interval," and "Action requirements" were replace with equivalent ITS terminology. The phrase "unless otherwise stated" was added to clarify that certain Required Actions must be completed although the associated Condition no longer exists.	LCO 3.0.2	3.0.1, 3.0.2
3.0 A3	The phrase "except as provided in the associated Action requirements" was revised to provide clarification of the conditions which must exist for an LCO to apply. The phrase "the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the LCO" was replaced to provide clarification, consistent with LCO 3.0.2, that completion of the Actions are required when exiting LCO 3.0.3.	LCO 3.0.3	3.0.2, 3.0.3
3.0 A4	Not used.		
3.0 A5	A new LCO was added to provide guidance and clarification regarding actions to be taken, including an evaluation in accordance with the Safety Function Determination Program, when a an LCO for a supported system is not met solely because the LCO for a support system is not being met.	LCO 3.0.6	N/A

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.0 A6	A new LCO was added to provide guidance and clarification regarding the applicability of Exception LCOs so that TS requirements may be changed to permit performance of special tests and operations.	LCO 3.0.7	N/A
3.0 A7	Statements were included to clarify that failure either to meet the SR acceptance criteria or to perform the SR within the specified Frequency constitutes failure to meet the LCO. The statement "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits" was included to establish the relationship between SRs and meeting LCOs.	SR 3.0.1	4.0.1, 4.0.3
3.0 A8	Surveillance interval extension SR was reworded to clarify the time from which the 25% extension is measured. The statement "Exceptions to this Specification are stated in the individual Specifications" was added to address those SRs to which Frequency extensions are not allowed.	SR 3.0.2	4.0.2
3.0 A9	SR requiring that surveillances be met within specified frequencies before entering a mode of applicability of the associated LCO was changed to conform with STS wording.	SR 3.0.4	4.0.4

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.0, LCO and SR Applicability</b>				
3.0 L1	The CTS shutdown requirements for placing the unit in a Mode in which an LCO does not apply use the words "next," "following," and "subsequent" to specify the time intervals for reaching lower Modes. The use of the ITS format of cumulative Completion Times for these intervals results in longer Completion Times for shutdown from lower Modes.	LCO 3.0.3	3.0.3	IV
3.0 L2	An exception to complying with required Actions when an LCO is not met was added to allow for equipment to be returned to service under administrative control only to perform testing in order to restore inoperable equipment to Operable status.	LCO 3.0.5, LCO 3.0.2	N/A	IV
3.0 L3	An allowance was added to allow for extending the Completion Time for Required Actions whose periodic performance is specified as "once per ... ." The 25% extension only applies to each performance after the initial performance.	SR 3.0.2	4.0.2	IV
3.0 L4	When a Surveillance Requirement has not been performed within the specified frequency, CTS requires immediate entry into the LCO while allowing the Action requirements to be delayed up to 24 hours when the allowed outage time for the Action requirements are less than 24 hours. These requirements were relaxed to allow, without regard for the allowed outage time of the Action requirements, a delay for entering the LCO up to 24 hours or the specified frequency, whichever is less, to permit the surveillance to be performed.	SR 3.0.3	4.0.3	III, VI

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.0 L5	The CTS restrict entry into the Modes or other specified conditions in the Applicability unless the LCO or Surveillance Requirements are met. The corresponding ITS limit these restrictions to entry into Modes 1, 2, 3, and 4 and allow Mode changes between Modes 5 and 6 while operating within required actions that limit continued operation or prior to meeting the Surveillance Requirements. The ITS also allow Mode changes that are a part of a unit shutdown.	LCO 3.0.4, SR 3.0.4	3.0.4, 4.0.4	I, II, IV

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific



Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
ITS Section 3.0, LCO and SR Applicability					
3.0 LA1	3.0.5, 4.0.6	Detailed guidance on applying LCOs to dual unit operation.	Bases	ITS 5.5.14	3

Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.0, LCO and SR Applicability</b>			
3.0 M1	For frequencies of surveillance requirements specified as "once," a requirement was added to disallow the 25% interval extension.	SR 3.0.2	4.0.2
3.0 M2	Upon discovery that a surveillance was not performed within its specified frequency, ITS allows a time, or delay period, to complete the surveillance before declaring that the associated LCO is not met. For surveillances not performed within the delay period, or if performed within the delay period and not met, the explicit requirement was added to require that the LCO be immediately declared not met and the applicable Condition(s) entered.	SR 3.0.3	4.0.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.1, Reactivity Control Systems</b>			
3.1 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.1	3/4.1 and 3/4.10
3.1 A2	Footnote reference to Special Test Exception (STE) Specification 3.10.1 was deleted in conformance with STS which reformats the presentation of these STE requirements in the ITS Specification to which they apply.	3.1.1 Applicability	3.1.1.1 Applicability
3.1 A3	Mode conditional information regarding beginning of life moderator temperature coefficient was moved from a footnote to the Applicability.	3.1.3 Applicability	3.1.1.3 Applicability
3.1 A4	Footnote reference to STE Specification 3.10.3 was deleted in conformance with STS which reformats the presentation of these STE requirements in the ITS Specification to which they apply.	3.1.3 Applicability	3.1.1.3 Applicability
3.1 A5	Footnote references to STE Specifications 3.10.2 and 3.10.3 were deleted in conformance with STS which reformats the presentation of these STE requirements in the ITS Specification. Referencing other specific TS is not necessary.	3.1.4 Applicability, 3.1.5 Applicability, 3.1.6 Applicability	3.1.3.1 Applicability, 3.1.3.5 Applicability, 3.1.3.6 Applicability
3.1 A6	Action to restore a trippable but misaligned rod to within alignment limits was deleted since the option to restore inoperable components currently exists and does not need to be stated.	3.1.4 Action B	3.1.3.1 Action b.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.1 A7	References to Specification 3.1.1.1 for determining that the shutdown margin (SDM) requirement is satisfied were replaced with specified actions and actions to initiate boration to restore SDM to within limit were included.	3.1.4 Actions A and B	3.1.3.1 Actions a and b.3
3.1 A8	The terms "upper MTC (moderator temperature coefficient)" and "lower MTC" were substituted for the equivalent CTS terms "BOL (beginning of life)" and "EOL (end of life)", respectively, for moderator temperature coefficient limits. The phrase "specified in the OLR (Operating Limits Report)" was deleted since it is redundant to the reference in the LCO.	3.1.3 Actions A and C	3.1.1.3 Applicability, Actions a and b
3.1 A9	Rod drop time LCO and SR for all rods following each removal of the reactor head were combined and retained as an SR in the ROD Group Alignment Limits Specification.	SR 3.1.4.3	3/4.1.3.4
3.1 A10	Obsolete, cycle-specific rod drop time limits were deleted.	SR 3.1.4.3	3.1.3.4
3.1 A11	The stated requirement to restore the rod drop time to within the LCO limit prior to proceeding to the Modes of Applicability was eliminated since it is redundant to the requirements of LCO 3.0.4.	N/A	3.1.3.4 Applicability and Action a, 3.0.4
3.1 A12	An explicit allowance for separate Condition entry for each inoperable rod position indicator or demand position indicator was included to clarify current practice for tracking allowable outage times for each inoperable component and the action for an inoperable demand position indicator was clarified with the addition of the phrase "for one or more banks".	3.1.7 Actions Note and Action C	3.1.3.2
3.1 A13	Not Used		

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.1 A14	Not used.		
3.1 A15	Not used.		
3.1 A16	The term "shutdown banks" was substituted for "shutdown rods" consistent with STS. Whenever a shutdown rod is not within limits, neither is the shutdown bank and the actions applicable to rods also apply to banks.	Specification 3.1.5	3/4.1.3.5
3.1 A17	The Applicability of the LCO for Physics Tests STE was revised to MODE 2 "during Physics Tests" to clarify that the exceptions apply only during Physics Tests with RTP $\leq$ 5%.	3.1.8 Applicability	3.10.3 Applicability
3.1 A18	The rod cluster control assembly (RCCA) pseudo ejection test, RCCA pseudo drop and misalignment test, and xenon stability test performed under this STE were part of the initial plant startup testing programs. This Specification was deleted since there is no need to repeat the performance of these tests.	N/A	3/4.10.2
3.1 A19	The rod worth measurement test to the N-1 condition performed under this STE is no longer used and was deleted. Other rod worth techniques provide the necessary physics measurements while maintaining SDM during the measurement process.	N/A	3/4.10.1
3.1 A20	The requirement to set the Reactor Trip Setpoints on the Operable Intermediate and Power Range Channels at $\leq$ 25% RTP is redundant to the values required in the Reactor Trip System instrumentation Specifications and was deleted.	LCO 3.1.8	3.10.3.b, Table 2.2-1, Table 3.3-1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.1 A21	Surveillance to compare measured to predicted core reactivity values was reformatted as an LCO with Applicability of Modes 1 and 2. Since effective full power days (EFPD) can only be accumulated during Modes 1 and 2, elimination of Modes 3 and 4 Applicability is consistent with the intent and performance of this SR.	Specification 3.1.2	4.1.1.1.2
3.1 A22	The requirement that predicted reactivity values "shall" be adjusted before 60 EFPD after refueling was changed to "may". Normalization is not necessary if predicted and measured core reactivity are in agreement.	SR 3.1.2.2	4.1.1.1.2
3.1 A23	A surveillance to determine SDM is within limits by verifying that control bank insertion is within limits and a surveillance to determine SDM is within limits prior to achieving reactor criticality by verifying that the predicted critical control rod position is within limits was moved from the SDM Specification to the control rod insertion limits Specification.	SR 3.1.6.1, SR 3.1.6.2, SR 3.1.6.3	4.1.1.1.1.b, 4.1.1.1.1.c

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.1, Reactivity Control Systems</b>				
3.1 L1	Completion time to "immediately initiate and continue boration" until Shutdown Margin (SDM) is restored was relaxed to "initiate boration" with a completion time of 15 minutes to provide the operator with sufficient time to perform the correct alignments and to start the required systems.	3.1.1 Action A	3.1.1.1 Action, 3.1.1.2 Action b	IV
3.1 L2	Default action to place the unit in a Mode in which the LCO does not apply was relaxed from "Mode 3" to "Mode 2 with $k_{eff} < 1.0$ " to be consistent with the Applicability.	3.1.3 Action B	3.1.1.3 Action a.1	III
3.1 L3	Moderator temperature coefficient (MTC) surveillance acceptance criteria was relaxed such that the surveillance need not be repeated if the MTC measured at the equivalent of equilibrium Rated Thermal Power (RTP) -all rods out (ARO) boron concentration of $\leq 60$ ppm is less negative than the 60 ppm surveillance limit specified in the Core Operating Limits Report (COLR).	SR 3.1.3.2 Note 3	4.1.1.3.b	V, VI
3.1 L4	Not used.			
3.1 L5	Not used.			
3.1 L6	Deleted Action requirement to reduce the High Neutron Flux Trip Setpoint to $\leq 85\%$ RTP within 4 hours when Power Operation is continued with an inoperable rod and SDM requirements are satisfied.	3.1.4 Actions	3.1.3.1 Action b.3.a	III

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1 L7	Not used.			
3.1 L8	Action requirements were relaxed to consider a rod Operable if it becomes immovable but remains trippable and aligned.	3.1.4 Actions	3.1.3.1 Actions a, b, and c	III
3.1 L9	Not used.			
3.1 L10	Deleted 18 month frequency for demonstrating rod drop times to preclude the possibility of a forced shutdown to perform the surveillance.	N/A	4.1.3.4.c	VI
3.1 L11	CTS allows a maximum of one DRPI per "bank" to be inoperable. The required Actions now apply to one DRPI inoperable per "group." This change relaxes the Action for banks with two groups to allow two DRPIs per bank to be inoperable before the specified Actions apply.	3.1.7 Actions A and B	3.1.3.2 Action a	III
3.1 L12	Not used.			
3.1 L13	The frequency for determining DRPI Operability was relaxed from at least once per 18 months to prior to criticality after each removal of the reactor head to preclude the potential for unnecessary plant transients if the surveillance is performed with the reactor at power.	SR 3.1.7.1	4.1.3.3	VI
3.1 L14	The completion time to withdraw the rods when a shutdown bank is not within insertion limits in accordance with the COLR was relaxed from 1 to 2 hours.	3.1.5 Action A	3.1.3.5 Action a	IV

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1 L15	CTS requires that, with more than one shutdown rod not fully withdrawn, the unit be placed in a Mode in which the LCO does not apply. Required Actions were relaxed to apply to one or more banks not fully withdrawn for up to 2 hours, provided compensatory Actions to verify SDM or initiate boration to restore SDM within limits within 1 hour.	3.1.5 Action A	3.1.3.5 Actions, 3.0.3	III
3.1 L16	The default Action to place the unit in a Mode in which the LCO does not apply has been relaxed from "Mode 3" to "Mode 2 with $k_{eff} < 1.0$ " to be consistent with the Applicability.	3.1.6 Action C	3.1.3.6 Action c	III
3.1 L17	Requirement to perform an additional Analog Channel Operational Test (Channel Operational Test) on each Intermediate and Power Range channel within 12 hours prior to initiating Physics Tests was deleted.	SR 3.1.8.1	4.10.3.2	VIII
3.1 L18	Initial performance, at least once per 31 effective full power days (EFPD), of the surveillance to verify that core reactivity balance agrees with predicted values, was relaxed to coincide with the performance prior to 60 EFPD after each fuel loading, which normalizes the predicted values to the measured values.	SR 3.1.2.2 Note 1	4.1.1.1.2	VI

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.1, Reactivity Control Systems</b>					
3.1 LA1	3/4.1.1.1, 3/4.1.1.2	Specific values for Shutdown Margin (SDM).	COLR	§50.59	1
3.1 LA2	3.1.1.1 Action, 3.1.1.2 Action b	Flow rate and solution concentration for boration when SDM is not within limit.	TRM	§50.59	2
3.1 LA3	4.1.1.1.1.d, 4.1.1.1.1.e, 4.1.1.1.2, 4.1.1.2.b	List of reactivity factors to be taken into account when determining SDM.	Bases	ITS 5.5.14	3
3.1 LA4	3.1.1.3 Action a.1, 3.1.1.3 Action a.2, 4.1.1.3.a	Details associated with the method of complying with the administrative control bank withdrawal limits that are established when moderator temperature coefficient (MTC) is more positive than the beginning of life (BOL) MTC limit.	Bases	ITS 5.5.14	3
3.1 LA5	3.1.1.3 Action a.3	Special Report to the Commission when the MTC is more positive than the upper (BOL) limit.	TRM	§50.59	3
3.1 LA6	3.1.3.1 Action a	Examples of what constitutes an immovable rod.	Bases	ITS 5.5.14	3
3.1 LA7	3.1.3.1 Action b.2	Aligning the remainder of the rods in the group with the inoperable rod and restricting Thermal Power in order to continue Power Operation with one rod trippable but inoperable.	Bases	ITS 5.5.14	2

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.1 LA8	3.1.3.1 Action b.3.d, Table 3.1-1	Table listing accident analyses requiring reevaluation in the event of an inoperable full-length rod.	Bases	ITS 5.5.14	3
3.1 LA9	4.1.3.1.1, 4.1.3.2, 4.1.3.6	Requirement to increase the surveillance frequency when the rod position deviation monitor is inoperable.	TRM	\$50.59	3
3.1 LA10	4.1.3.4.b	Post maintenance testing requirements to demonstrate the rod drop time limits of full-length rods.	TRM	\$50.59	3
3.1 LA11	3.1.3.2	Requirement that the position indication systems must be capable of determining the control rod positions within $\pm 12$ steps.	Bases	ITS 5.5.14	1
3.1 LA12	4.1.3.5.a	Verification that each shutdown bank is within the insertion limit specified in the COLR within 15 minutes prior to withdrawal of any control bank rods during an approach to criticality.	TRM	\$50.59	3
3.1 LA13	3.1.3.6 Action b	Requirement to restore the control banks to within limits by reducing Thermal Power to be consistent with rod position when the control banks are outside the acceptable insertion limits.	Bases	ITS 5.5.14	3
3.1 LA14	3.1.3.1 Action b.3.c	Use of a power distribution map from the movable incore detectors to verify the Heat Flux Hot Channel Factor and the Nuclear Enthalpy Rise Hot Channel Factor.	Bases	ITS 5.5.14	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.1 LA15	3/4.1.2.5, 3/4.1.2.6	Borated water source controls for the Boric Acid Storage System and the refueling water storage tank (RWST).	TRM	\$50.59	N/A
	3.1.1.2 Action a	Actions associated with the Boron Dilution Protection System when $SDM \leq 1.3\% \Delta k/k$ in Mode 5.	TRM	\$50.59	2
3.1 LA16	4.1.1.1.1.a, 4.1.1.2.a	Increased frequency of SDM determinations after detection of an inoperable control rod in Mode 2 with $k_{eff} < 1.0$ and Modes 3,4 and 5.	TRM	\$50.59	3
3.1 LA17	4.1.1.1.1.d	Procedural prerequisite to perform SDM determination with control banks at the maximum insertion limit.	TRM	\$50.59	3

Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.1, Reactivity Control Systems</b>			
3.1 M1	A requirement for performing a reactivity balance calculation for Mode 2 with $k_{eff} < 1.0$ was added to ensure that sufficient negative reactivity is provided to meet the assumptions of the safety analyses.	SR 3.1.1.1	4.1.1.1.1.e
3.1 M2	The allowance for Mode changes with the moderator temperature coefficient (MTC) more positive than the upper limit specified in the Core Operating Limits Report (COLR) was removed to prohibit changing Modes with control rod withdrawal limits not established.	SR 3.1.3.1	3.1.1.3 Action a.4
3.1 M3	Not used.		
3.1 M4	The allowance for continued power operation with more than one rod inoperable or misaligned, provided the remainder of the rods in the group are aligned with the inoperable rods within 1 hour and the inoperable rods are restored within 72 hours, has been deleted and replaced with requirements to verify shutdown margin (SDM) or borate to SDM within 1 hour, and shutdown to Mode 3 within 6 hours.	3.1.4 Action D	3.1.3.1 Action c
3.1 M5	The allowance for performing rod drop testing with only three reactor coolant pumps operating, provided thermal power is restricted to $\leq 66\%$ Rated Thermal Power (RTP), was replaced with a requirement that all four pumps be operating to perform this test.	SR 3.1.4.3	3.1.3.4 Action b
3.1 M6	Changes to the Shutdown Rod (bank) Insertion Limits Specification included broadening the Applicability to "Mode 2 with any control bank not fully inserted," reducing to 1 hour the effective time to determine SDM requirements are satisfied, and the disallowance for continued operation with a shutdown bank not within insertion limits.	3.1.5 Applicability and Actions	3.1.3.5 Applicability and Action b, 4.1.1.1.1.c
3.1 M7	Changes to the Control Rod (bank) Insertion Limits Specification included the addition of sequence and overlap limits to the LCO requirements, associated actions, and an associated SR.	3.1.6	3/4.1.3.6

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.1 M8	The action to verify SDM or initiate boration to restore SDM within 1 hour was added when the control banks are inserted beyond the insertion limits.	3.1.6 Action A	3.1.3.6 Actions
3.1 M9	An LCO was added to provide new Actions if the measured core reactivity is not within $\pm 1\%$ $\Delta k/k$ of predicted values.	3.1.2	4.1.1.1.2
3.1 M10	Changes to the Special Test Exception ( STE) for the suspension of certain Specifications during Physics Tests included an additional requirement that SDM must be within the limits specified in the COLR and an SR to perform this verification. Also included was an action to initiate boration to restore SDM within limits within 15 minutes and to suspend Physics Tests exceptions within 1 hour if the SDM requirement is not met.	3.1.8	3/4.10.3
3.1 M11	An Action was added to place the unit in a Mode in which the LCO does not apply when the Action requirements for the Digital Rod Position Indication System or the Demand Position Indication System are not met, rather than defer to LCO 3.0.3 for this requirement. The result is a completion time of 1 hour less to have the unit in Mode 3.	3.1.7 Action D	3.1.3.2 Actions, 3.0.3
3.1 M12	An Action was added to place the unit in a Mode in which the LCO does not apply when the Action requirements for a misaligned but trippable rod are not met, rather than defer to LCO 3.0.3 for this requirement. The result is a completion time of 1 hour less to have the unit in Mode 3.	3.1.4 Action C	3.1.3.1 Actions, 3.0.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.2, Power Distribution Limits</b>			
3.2 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.2	3/4.2
3.2 A2	Not used.		
3.2 A3	Not used.		
3.2 A4	The minimum (15%) range of Rated Thermal Power (RTP) at which the indicated axial flux difference (AFD) may deviate outside the required target band subject to the specified cumulative penalty deviation time was deleted since it is redundant to the Applicability.	LCO 3.2.3.c	3.2.1
3.2 A5	Applicability references to Special Test Exceptions (STE) Specification 3.10.2 were deleted since this STE Specification was deleted: there is no need to cross reference in the ITS.	LCO 3.2.3, LCO 3.2.4	3.2.1, 3.2.4
3.2 A6	The frequency and method of performing target flux difference determinations by both measurement and design prediction updates was clarified, consistent with CTS practice.	SR 3.2.3.3, SR 3.2.3.2	4.2.1.3, 4.2.1.4
3.2 A7	The cumulative penalty deviation time limitation for allowing indicated AFD to deviate outside the target band for operation at 15-50% RTP was deleted, consistent with the Applicability and since the associated Action requirements prevent increasing power $\geq$ 50% until AFD is within the target band.	LCO 3.2.3.c, 3.2.3 Action C	3.2.1, 3.2.1 Action c

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.2 A8	Substitution of essentially equivalent ">" and "≤" for "above" and "less than or equal to", respectively; an editorial change consistent with the STS.	SR 3.2.4.2 Note, SR 3.2.4.1 Note 1	4.2.4.2, Table 3.3-1 Action 2.c
3.2 A9	The Action to restore $F_{\Delta H}^N$ to within limits was deleted since the option to restore out of limit conditions always applies and does not need to be stated.	3.2.2 Actions	3.2.3 Action a.1
3.2 A10	A note was included to clarify the CTS intent that Thermal Power need not be reduced to perform Nuclear Enthalpy Rise Hot Channel Factor limit verifications prior to increasing Thermal Power beyond specified RTP levels.	3.2.2 Required Action A.4 Note	3.2.3 Actions
3.2 A11	Exception to the provisions of CTS 4.0.4 was removed for the Surveillance Requirements of $F_{\Delta H}^N$ limits. Wording and format of the surveillance and SR 3.0.4 make such exceptions unnecessary.	SR 3.2.2.1, SR 3.0.4	4.2.3.1
3.2 A12	Actions to restore Quadrant Power Tilt Ratio to within limits was deleted since the provision to restore out of limit conditions always applies and does not need to be stated.	3.2.4 Action A	3.2.4 Actions a.1.a and a.2.a

(By) - Byron specific  
(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.2, Power Distribution Limits</b>				
3.2 L1	The Action to reduce the Power Range Neutron Flux - High Setpoints to $\leq$ 55% Rated Thermal Power (RTP) when the axial flux difference (AFD) is outside the target band or Acceptable Operation Limits was deleted. The Action to reduce power level to $<$ 50% RTP and the overtemperature $\Delta T$ trip function ensures that power distributions remain within assumptions.	3.2.3 Action C	3.2.1 Action b.2	III
3.2 L2	The increased frequency for monitoring the AFD for each Operable excore channel for 24 hours following restoration of an AFD Monitor Alarm was deleted since the monitor alarm memory can be manually updated for the previous 24 hours to confirm AFD is within limits.	SR 3.2.3.1	4.2.1.1.a.2	VI
3.2 L3	CTS requires that, with the indicated AFD outside the required target band, either the restoration Action or the power reduction Action be completed within 15 minutes. ITS allows these Actions to be completed sequentially, resulting in an additional 15 minutes for completion of power reduction.	3.2.3 Actions A and B	3.2.1 Action a	IV
3.2 L4	With the quadrant power tilt ratio (QPTR) not within limit, the specified interval for performing the calculation was increased from one hour to 12 hours with a power reduction requirement dependent upon the calculation.	3.2.4 Required Action A.2	3.2.4 Action a.1	VI

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L5	With the QPTR not within limit, actions to reduce the Power Range Neutron Flux-High Trip Setpoints within the next 4 hours were deleted. Compensatory actions to increase the frequency of monitoring peaking factors would result in reducing the Power Range Neutron Flux-High Trip Setpoints if not met.	3.2.4 Actions	3.2.4 Actions a.2.b and a.3	III
3.2 L6	The completion time for reducing power to exit the Applicability (50% RTP) if the QPTR is not restored to within limit was increased from 2 hours to 4 hours in consideration of the additional Actions required in ITS.	3.2.4 Action B	3.2.4 Action a.3	IV
3.2 L7	CTS requires the identification and correction of the out of limit QPTR condition prior to increasing power, and after power is increased above 50% RTP the QPTR must be calculated once per hour for 12 hours. These Actions were replaced with Actions to verify the peaking factor remain within their limiting values following the Thermal Power increase, and to re-evaluate the safety analyses to ensure that the reactor core conditions remain bounded and recalibrate the excore detectors to normalize currents and eliminate the indicated tilt prior increasing Thermal Power.	3.2.4 Required Actions A.4, A.5, and A.6	3.2.4 Action a.4	III
3.2 L8	Separate Action requirements for QPTR > 1.09 have been deleted and replaced with one set of requirements which applies to any out of limit QPTR. These Actions ensure that the peaking factors are met and remain below their limiting values, and that the gross radial power distribution remains consistent with the design values used in the safety analyses.	3.2.4 Action A	3.2.4 Actions b and c	III

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L9	The $F_{xy}(Z)$ methodology for monitoring compliance with the Heat Flux Hot Channel Factor LCO was changed to the $F_Q(Z)W(Z)$ methodology as allowed by STS. The new methodology provides more available margin to the $F_Q(Z)$ limit than is available with the current methodology. This change also incorporates an allowance to reduce Thermal Power below the APL whenever $F_Q^W(Z)$ limits are not met rather than reducing AFD limits.	3.2.1	3/4.2.2	I, III, V
3.2 L10	The completion time for reducing the Power Range Neutron Flux-High Trip Setpoints following a prompt reduction in power was changed from 4 hours to 72 hours to provide adequate time to accomplish the action.	3.2.1 Required Action A.2	3.2.2 Action a	IV
3.2 L11	The completion time for reducing thermal power to < 50% RTP following an Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ) excursion was changed from 2 hours to 4 hours to provide time to complete an orderly shutdown.	3.2.2 Required Action A.1	3.2.3 Action a	IV
3.2 L12	The completion time for reducing the Power Range Neutron Flux-High Trip Setpoints following a prompt reduction in power was changed from 4 hours to 72 hours to provide adequate time to accomplish the Action.	3.2.2 Required Action A.3	3.2.3 Action a.2	IV
3.2 L13	The completion time for reducing power < 5% RTP if $F_{\Delta H}^N$ cannot be restored to within limits within 24 hours was changed from 2 hours to 6 hours to provide adequate time to accomplish the Action.	3.2.2 Required Action B	3.2.3 Action b	IV

**Less Restrictive Change Categories**

- I Relaxation of LCOs and Administrative Controls
- II Relaxation of Applicability
- III Relaxation of action requirements
- IV Relaxation of Completion Time

- V Relaxation of SR acceptance criteria
- VI Relaxation of Surveillance Frequency
- VII Deletion of requirements redundant to regulation
- VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.2 L14	CTS requires verification that the QPTR is within limit within 24 hours after exceeding the limit. This Action was replaced with Actions to verify the peaking factor remains within its limiting values following the Thermal Power increase, and to re-evaluate the safety analyses to ensure that the reactor core conditions remain bounded and recalibrate the excore detectors to normalize currents and eliminate the indicated tilt prior increasing Thermal Power.	3.2.4 Required Actions A.4, A.5, and A.6	3.2.4 Action a.3	III
3.2 L15	With one channel of Power Range Neutron Flux instrumentation inoperable and if power is restricted to $\leq 75\%$ RTP, the requirement to also reduce the Power Range Neutron Flux Trip Setpoint was deleted since an alternate method of verifying QPTR is available.	SR 3.2.4.1	Table 3.3-1 Action 2.c	III
3.2 L16	The surveillance to verify QPTR once per 12 hours using incore detectors with one Power Range Neutron Flux channel inoperable, was modified to allow its initial performance 12 hours after increasing Thermal Power $> 75\%$ RTP rather than requiring the surveillance to be met prior to entering this power condition.	SR 3.2.4.2 Note	4.2.4.2	VI
3.2 L17	The method for performing the surveillance to verify QPTR within limit when $\leq 75\%$ RTP was changed to allow the alternate use of movable incore detectors when one or more Power Range Neutron Flux channels is inoperable.	SR 3.2.4.1 Note 2	4.2.4.2, 1.25	V

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.2, Power Distribution Limits</b>					
3.2 LA1	4.2.4.2	Details regarding the method for confirming the normalized symmetric power distribution.	Bases	ITS 5.5.14	3
3.2 LA2	3.2.2	Details for calculating Heat Flux Hot Channel Factor, $F_Q(z)$ .	COLR	§50.59	3
3.2 LA3	3.2.3	Details for calculating Nuclear Enthalpy Rise Hot Channel Factor, $F_{\Delta H}^N$ .	Bases COLR	ITS 5.5.14 §50.59	3
3.2 LA4	4.2.1.4	Alternate methods for determining target flux difference.	Bases	ITS 5.5.14	3
3.2 LA5	3.2.2 Action b, 3.2.3 Action c	Action to identify and correct the cause of the out of limit condition prior to increasing thermal power.	TRM	§50.59	3
3.2 LA6	4.2.1.1.b, 4.2.4.1.b	Conditional surveillance requirements whenever the axial flux difference (AFD) monitor alarm or quadrant power tilt ratio (QPTR) monitor alarm is inoperable.	TRM	§50.59	3
3.2 LA7	4.2.1.3	Details for determining the target flux difference during surveillance.	Bases	ITS 5.5.14	3
3.2 LA8	3.2.2 Action b, 3.2.3 Actions b and c	Use of incore flux mapping to verify $F_Q(z)$ and $F_{\Delta H}^N$ .	Bases	ITS 5.5.14	3

## Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific

(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.2, Power Distribution Limits</b>			
3.2 M1	An Actions note was added to require completion of the Action to reduce power to < 50% whenever initiated. Consequently, reduction of power to < 50% is required even though the indicated AFD is restored to within either the required target band or the acceptable operation limits before reaching 50% power.	3.2.3 Action C	3.2.1 Action b
3.2 M2	An Action was included to require further reduction in power to < 15% within 9 hours if the indicated AFD is not restored to within the required target band or within the acceptable operation limits within 30 minutes.	3.2.3 Action D	3.2.1 Action c

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.1 L15	CTS requires that, with more than one shutdown rod not fully withdrawn, the unit be placed in a Mode in which the LCO does not apply. Required Actions were relaxed to apply to one or more banks not fully withdrawn for up to 2 hours, provided compensatory Actions to verify SDM or initiate boration to restore SDM within limits within 1 hour.	3.1.5 Action A	3.1.3.5 Actions, 3.0.3	III
3.1 L16	The default Action to place the unit in a Mode in which the LCO does not apply has been relaxed from "Mode 3" to "Mode 2 with $k_{eff} < 1.0$ " to be consistent with the Applicability.	3.1.6 Action C	3.1.3.6 Action c	III
3.1 L17	Requirement to perform an additional Analog Channel Operational Test (Channel Operational Test) on each Intermediate and Power Range channel within 12 hours prior to initiating Physics Tests was deleted.	SR 3.1.8.1	4.10.3.2	VIII
3.1 L18	Initial performance, at least once per 31 effective full power days (EFPD), of the surveillance to verify that core reactivity balance agrees with predicted values, was relaxed to coincide with the performance prior to 60 EFPD after each fuel loading, which normalizes the predicted values to the measured values.	SR 3.1.2.2 Note 1	4.1.1.1.2	VI

**Less Restrictive Change Categories**

- I Relaxation of LCOs and Administrative Controls
- II Relaxation of Applicability
- III Relaxation of action requirements
- IV Relaxation of Completion Time

- V Relaxation of SR acceptance criteria
- VI Relaxation of Surveillance Frequency
- VII Deletion of requirements redundant to regulation
- VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.3, Instrumentation</b>			
3.3 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.3	3/4.1.2.7, 3/4.3
3.3 A2	The "Total Number of Channels" and "Minimum Channels Operable" columns were replaced by a "Required Channels" column consistent with STS format.	Tables 3.3.1-1, 3.3.2-1, 3.3.3-1, 3.3.6-1, 3.3.7-1, 3.3.8-1	Tables 3.3-1, 3.3-3, 3.3-6, 3.3-10
3.3 A3	Mode applicable information was reformatted for the Intermediate Range and Power Range Neutron Flux channels.	SR 3.3.1.11	Table 4.3-1 Note 5a
3.3 A4	Monthly and quarterly calibrations of the Power Range Neutron Flux channel high setpoint was reformatted as surveillances for the Overtemperature $\Delta T$ .	SR 3.3.1.3, SR 3.3.1.6	Table 4.3-1 Function 2.a
3.3 A5	The frequencies for surveillances designated to be performed on an Staggered Test Basis were revised to maintain the same testing interval consistent with the revised definition of Staggered Test Basis.	SR 3.3.1.4, SR 3.3.1.5, SR 3.3.2.4, SR 3.3.2.5	Table 4.3-1 Notes 7 and 11, Table 4.3-2 Note 1

(By) - Byron specific  
(Bw) - Braidwood specific



**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.3 A6	Explicit allowances for separate condition entry for each inoperable function for Reactor Trip System (RTS) instrumentation, Engineered Safety Feature Actuation System (ESFAS) instrumentation, Remote Shutdown System, and Containment Ventilation Isolation instrumentation were included to clarify current practice for tracking allowable outage times for each inoperable component.	3.3.1 Actions Note, 3.3.2 Actions Note, 3.3.6 Actions Note, 3.3.4 Actions Note 2	3.3.1 Actions, 3.3.2 Actions, 3.3.3.1 Actions, 3.3.3.5 Actions
3.3 A7	Various obsolete, cycle-specific references and requirements were deleted.	Table 3.3.1-1, Table 3.3.2-1, SR 3.3.4.2, SR 3.3.3.2	Table 2.2-1 Notations, Table 3.3-4, Table 4.3-1 Notations, Table 4.3-6
3.3 A8	Required actions were reformatted for RTS and ESFAS instrumentation setpoints less conservative than the allowable values.	3.3.1 Action A, 3.3.2 Action A	2.2.1 Action b, 3.3.2 Action b
3.3 A9	The methodologies for calculating trip setpoints and allowable values were reformatted for RTS Overtemperature $\Delta T$ and Overpower $\Delta T$ functions.	Table 3.3.1-1 Notes 1 and 2	Table 2.2-1 Notes 1-4
3.3 A10	The conditions in Mode 2 to which the Operability requirements of the Intermediate Range Neutron Flux instrumentation apply were clarified in actions which remove the unit from the power levels applicable to these instruments.	3.3.1 Actions F and G	Table 3.3-1
3.3 A11	Detailed information redundant to the definition of Staggered Test Basis was deleted from surveillances for RTS and ESFAS Response Time verifications.	SR 3.3.1.15, SR 3.3.2.12	4.3.1.2, 4.3.2.2

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.3 A12	The current exception to the shutdown provisions of Specification 3.0.3 was determined to be unnecessary when applied to the Control Room Ventilation (VC) Filtration System actuation and Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System actuation instrumentation Specifications.	3.3.7 Actions, 3.3.8 Actions	3.3.3.1 Action c
3.3 A13	A note was included to clarify that neutron detectors are excluded from Channel Calibrations; consistent with CTS practices.	SR 3.3.4.2	4.3.3.5
3.3 A14	Clarification that Channel Checks are required for Remote Shutdown System instrumentation that is normally energized was included to provide an exception for the source range neutron flux monitor consistent with current requirements.	SR 3.3.4.1	4.3.3.5
3.3 A15	Not used.		
3.3 A16	The presentation of the number of required channels of Reactor Trip System instrumentation was revised for clarification.	Table 3.3.1-1 Functions 11, 12, 13, and 15	Table 3.3-1 Functions 14, 15, 16, and 18
3.3 A17	A note was included to clarify that verification of ESFAS instrumentation setpoints is not required for manual initiation functions during Trip Actuating Device Operational Test (TADOT) surveillances.	SR 3.3.2.9 Note	Table 4.3-2 Note 3
3.3 A18	"≥" was used to clarify the ESFAS instrumentation trip setpoint allowable values consistent with current design basis. Also, the allowable value for the Reactor Water Storage Tank low-low level setpoint was clarified as the percent "of instrument span."	Table 3.3.2-1 Functions 6.d and 7.b	Table 3.3-4 Functions 6.f and 7.b

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.3 A19	Not used.		
3.3 A20	The RTS reactor coolant flow-low function for single loop and two loop conditions were combined with the appropriate interlock reference since this function uses common instruments.	Table 3.3.1-1 Function 10	Table 3.3-1 Function 12
3.3 A21	The 18-month TADOT surveillance for the Reactor Trip Bypass Breakers (RTBBs) was deleted because the monthly TADOT surveillance for the Reactor Trip Breakers (RTBs) includes the functioning of the RTBBs.	Table 3.3.1-1 Functions 18 and 19, SR 3.3.1.4	Table 4.3-1 Function 22
3.3 A22	The ESFAS Instrumentation Trip Setpoints for the Auxiliary Feedwater pump suction low pressure function to transfer from the Condensate Storage Tank to the Essential Service Water System were in accordance with Amendments 104/96.	Table 3.3.2-1 Function 6.f	Table 3.3-4 Function 6.g
3.3 A23	A note was included to explain applicability of STS LCO 3.0.4 for the entry into only Modes 1, 2, 3, and 4 and precludes mode change into Mode 5 with the Rod Control System capable of rod withdrawal or all rods not fully inserted for RTBs, RTBBs, or the automatic trip logic functions inoperable. This change is consistent with practices of the CTS.	Table 3.3.1-1 Functions 18, 19, and 20, 3.3.1 Action C Note	Table 3.3-1 Actions 10 and 13
3.3 A24	The term "Source Range Block Permissive" was substituted for the term "Intermediate Range Neutron Flux" for the P-6 RTS interlock, consistent with plant design and terminology.	Table 3.3.1-1 Function 17.a, Note (d)	Tables 2.2-1 and 4.3-1 Function 19.a, Table 3.3-1 Function 19.a, Note ##, and Action 3.b

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.3 A25	The allowable values for the P-10 and P13 interlocks' input to the Low Power Reactor Trips Block function was deleted since the values for these interlocks are provided elsewhere in the table.	Table 3.3.1-1 Functions 17.b.1 and 17.b.2	Table 2.2-1 Functions 19.b.1 and 19.b.2
3.3 A26	The Mode 3 Applicability for pressurizer pressure - low and steam line pressure - low functions were reformatted with notes that clarify reactor conditions, in relation to the P-11 interlock, in which these functions are required to be Operable.	Table 3.3.2-1 Functions 1.d, 1.e, and 4.d.1	Table 3.3-3 Functions 1.d, 1.e, and 4.d

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(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.3, Instrumentation</b>				
3.3 L1	The action to open the Reactor Trip System breakers (RTBs) within 1 hour if unable to restore certain inoperable reactor trip functions was revised to fully insert all rods immediately and to place the Rod Control System in a condition incapable of rod withdrawal. The conditions in Modes 3, 4, and 5 when these actions are required was revised based on the insertion status of all rods rather than on the position of the RTBs because there are necessary activities which require the RTBs closed.	Table 3.3.1-1 Note a, 3.3.1 Action C	Table 3.3-1 Action 10 and Note *, Table 4.3-1 Action 13 and Note *	II, III
3.3 L2	The exception to the provisions of Specification 4.0.3 was deleted resulting in the default allowance of 24 hours to successfully perform the incore to excore Axial Flux Difference calibration before entering the LCO actions.	SR 3.3.1.3, SR 3.0.3	Table 4.3-1 Note 3	VI
3.3 L3	The applicable Modes and conditions during which the Engineered Safety Features Actuation System (ESFAS) steam line isolation functions are required to be Operable were relaxed for Modes 2 and 3 to except when all Main Steam Isolation Valves (MSIVs) and their bypass valves, as applicable, are closed since the valves are performing their safety function in this position.	Table 3.3.2-1 Function 4a	Table 3.3-3 Function 4a	II
3.3 L4	CTS invokes the shutdown provisions of Specification 3.0.3 whenever two channels of intermediate range neutron flux instrumentation are inoperable. Actions were included to allow two channels inoperable provided positive reactivity additions are suspended immediately and Thermal Power is reduced to < P-6 within 2 hours.	3.3.1 Action G	Table 3.3-1 Actions, 3.0.3	III

**Less Restrictive Change Categories**

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|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L5	The action to open the Reactor Trip System breakers (RTBs) within 1 hour if unable to restore an inoperable source range neutron flux instrumentation channel was revised to fully insert all rods immediately and to place the Rod Control System in a condition incapable of rod withdrawal. The conditions in Modes 3, 4, and 5 when these actions are required was revised based on the insertion status of all rods rather than on the position of the RTBs because there are necessary activities which require the RTBs closed.	3.3.1 Action J	Table 3.3-1 Action 5a	II, III
3.3 L6	An allowance for up to 4 hours was included for surveillance testing of a second channel of refueling water storage tank (RWST) level-low low actuation instrumentation whenever the first channel is inoperable since actuation capability is maintained during testing.	3.3.2 Action K Note	Table 3.3-3 Action 15	III
3.3 L7	Not used.			
3.3 L8	The completion time for an inoperable channel of containment pressure actuation instrumentation was revised to allow 6 hours for placing the channel in the bypassed condition.	3.3.2 Action E	Table 3.3-3 Action 16	IV

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L9	Actions associated with two inoperable channels of ESF bus undervoltage and grid degraded voltage (loss of power DG) instrumentation were revised to allow an additional hour to restore one of the channels to Operable before initiating unit shutdown actions. Also, the implicit requirement to initiate shutdown actions when required actions or associated completion times are not met was revised to explicitly allow entry of applicable DG Specification requirements to provide appropriate compensatory actions.	3.3.5 Actions B and C	Table 3.3-3 Action 25, 3.0.3	III
3.3 L10	The applicable Modes during which the Auxiliary Feedwater System (AF) loss of offsite power instrumentation is required to be Operable was revised to delete Mode 4 since AF is not required for heat removal in this Mode.	Table 3.3.2-1 Function 6.d	Table 3.3-3 Function 6.f	II
3.3 L11	The default requirement for surveillances to be met prior to entry into the Modes and conditions of applicability was relaxed for power, intermediate, and source range instrumentation when reducing power. Because these surveillances cannot be performed in the higher Modes or conditions without the use of jumpers or lifted leads, 4 hours was allowed to perform the surveillances after entering the applicable Mode or condition to avoid the possibility of an inadvertent transient.	SR 3.3.1.7 Note, SR 3.3.1.8 Frequency, SR 3.3.9.1 Note, SR 3.3.9.8 Note	4.1.2.7.a, Table 4.3-1, 4.0.4	VI
3.3 L12	ITS allows 8 hrs to restore Radiation Monitor Channel to Operability before containment purge valve closure is required; CTS requires immediate closure.	3.3.6 Actions	Table 3.3-6 Action 26	IV
3.3 L13	Not used.			

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

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**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L14	The action required when one intermediate range neutron flux instrumentation channel is inoperable was revised from restoring the inoperable channel prior to increasing power above 10% Rated Thermal Power (RTP) to allow the option of exiting the Mode of applicability by increasing RTP above 10%.	3.3.1 Action F	Table 3.3-1 Action 3.b	III
3.3 L15	The applicable conditions during which the Fuel Handling Building (FHB) Ventilation System actuation instrumentation is required to be Operable was revised, consistent with the design basis fuel handling accident, from when fuel is in the fuel storage areas or FHB to 1) during movement of irradiated fuel assemblies in the FHB, 2) during movement of irradiated fuel assemblies in the containment with the equipment hatch not intact, and 3) during Core Alterations with the equipment hatch not intact.	Table 3.3.8-1 Notes a, b, and c	Table 3.3-6 Note *	II
3.3 L16	The actions required when a FHB Ventilation System actuation channel is inoperable was revised to allow a 7 day restoration time prior to taking prescribed compensatory actions since the remaining FHB Ventilation System train is capable of performing the required function.	3.3.8 Action A	3.9.12 Action a	III
3.3 L17	Actions have been included, consistent with the revised FHB Ventilation System Specification applicability, to suspend movement of irradiated fuel assemblies in the containment and to suspend Core Alterations when the equipment hatch is not intact with two channels of FHB Ventilation System actuation instrumentation inoperable.	3.3.8 Action B	3.9.12 Action b	III

**Less Restrictive Change Categories**

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|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L18	The applicable Modes and conditions during which the containment radiation monitoring instrumentation is required to be Operable was revised from all Modes to Modes 1, 2, 3, 4 and during purging operations since operator actions are sufficient in other Modes and conditions to minimize offsite doses.	Table 3.3.6-1 Note a	Table 3.3-6 Function 2	II
3.3 L19	The time allowed for restoration of inoperable channel(s) of Remote Shutdown System instrumentation was relaxed from 7 days to 30 days to allow additional time to restore the system to Operable to preclude a unit shutdown.	3.3.4 Action A	3.3.3.5 Action a	IV
3.3 L20	The time allowed for restoration of Post Accident Monitoring (PAM) instrumentation to meet Operability requirements was relaxed from 7 days to 30 days to allow additional time to restore the function to Operable. Also, the actions related to unit shutdown when PAM instruments (including hydrogen monitors) are not restored to meet Operability requirements were replaced with the requirement to submit to the Commission a PAM Report within 14 days.	3.3.3 Actions B and C	3.3.3.6 Action a, 3.6.4.1 Action a	III, IV
3.3 L21	The frequency for performing a Channel Check on the hydrogen monitors was extended from every 12 hours to every 31 days consistent with other PAM instruments.	SR 3.3.3.1	4.6.4.1	VI
3.3 L22	The time allowed for restoration whenever no channels (one channel in the case hydrogen monitors) of PAM instrumentation are Operable was relaxed from 48 hours to 7 days to allow additional time to restore the function in order to preclude a unit shutdown.	3.3.3 E	3.3.3.6 Action b	IV

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

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(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L23	The reactor vessel water level monitoring function was included in the PAM functions which, if not restored as required in the prescribed times, require the submittal of a PAM Report to the Commission rather than those functions which require unit shutdown.	3.3.3 Action H	3.3.3.6 Action c	III
3.3 L24	The requirement to verify that each Boron Dilution Protection System valve actuates to its correct position on a test signal was changed to allow actual as well as simulated signals for actuation during operation as well as during shutdown. This allows credit for the surveillance if a valid actuation occurs during operation or through post-maintenance testing that satisfies the surveillance.	SR 3.3.9.9	4.1.2.7.d	V
3.3 L25	With an inoperable channel of power range neutron flux - high setpoint instrumentation, the action to reduce the trip setpoint to $\leq 85\%$ RTP was deleted since the loss of one power range channel does not affect the reliability of the Reactor Trip System and the Quadrant Power Tilt Ratio (QPTR) Specification provides adequate remedial measures.	3.3.1 Action D.1.2	Table 3.3-1 Action 2.c	III
3.3 L26	With an inoperable channel of power range neutron flux - low setpoint or power range neutron flux rate instrumentation, the action to either reduce/limit power to 75% RTP or increase the frequency of QPTR monitoring was deleted since these actions are unnecessary to ensure core power distribution remains within limits.	3.3.1 Action E	Table 3.3-1 Action 2.c	III

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

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(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.3 L27	The actions required for an inoperable RTB or Reactor Trip Bypass Breaker (RTBB) were revised to include a 1 hour restoration allowance consistent with default shutdown requirements. The additional hour can be used to complete an orderly shutdown to Mode 3.	3.3.1 Action N	Table 3.3-1 Actions 12.b and 13	III
3.3 L28	A note stating that the verification of setpoints is not required in performing the 18 month frequency Trip Actuating Device Operational Test (TADOT) surveillance of the manual reactor trip, safety injection input from ESF, and reactor coolant pump breaker position trip functions was included, consistent with other Reactor Trip System (RTS) instrumentation TADOT surveillances, since the affected functions have no setpoints associated with them.	SR 3.3.1.13 Note	Table 4.3-1 Functions 1, 17, and 18 and Note 10	V
3.3 L29	Neutron detectors were excluded from the 18 month frequency RTS Response Time surveillance because of the difficulty in generating an appropriate detector input signal and since these detectors provide a virtually instantaneous response.	SR 3.3.1.15 Note	SR 4.3.1.2	V

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.3, Instrumentation</b>					
3.3 LA1	3.1.2.7 Actions, Table 3.3-1 Action 5.b	List of valves to be verified closed in the event of a Boron Dilution Protection System (BDPS) inoperability.	Bases	ITS 5.5.14	1
3.3 LA2	Table 3.3-1 Function 6.c and Note **	Function of the source range neutron flux monitor with the Reactor Trip Breakers (RTBs) in the open position.	Bases	ITS 5.5.14	1
3.3 LA3	Not used.				
3.3 LA4	Table 3.3-1 Action 8, Table 4.3-1 Note 9	Verifying that interlocks are in their required state for existing unit conditions by observing the annunciator window.	TRM	§50.59	3
3.3 LA5	Tables 3.3-1 and 3.3-3	Channels of Reactor Trip System (RTS) and Engineered Safety Features Actuation System (ESFAS) instrumentation necessary for an actuation function.	Bases UFSAR	ITS 5.5.14 §50.59	1
3.3 LA6	Not used.				
3.3 LA7	Table 3.3-6 Note **	Method for determining the containment radioactivity- high monitor trip setpoint for containment venting and purging operations.	ODCM	ITS 5.5.1.c	3
	2.2.1, 3/4.3.2, 3.3.3.1, 3.3.3.1.a	Trip/alarm setpoint for RTS, ESFAS, and radiation monitoring instrumentation actuation functions.	TRM	§50.59	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.3 LA8	Table 2.2-1 Function 12	Details of the trip setpoint basis for the reactor coolant flow-low function.	Bases	ITS 5.5.14	1
3.3 LA9	4.1.2.7.d	Details for performing the BDPS valve actuation test.	Bases	ITS 5.5.14	3
3.3 LA10	Not used.				
3.3 LA11	Table 4.3-1 Notes 5a and 5b	Details for performing Channel Calibrations of neutron flux monitors intermediate and source range and power range high setpoint.	Bases	ITS 5.5.14	3
3.3 LA12	Table 4.3-1 Note 11	The requirement to perform a Trip Actuating Device Operational Test (TADOT) on the RTBs following maintenance or adjustment.	TRM	\$50.59	3
3.3 LA13	Table 3.3-3 Functions 1, 6.c, 6.d, 6.e, 6.g	Design details regarding ESFAS functions.	Bases	ITS 5.5.14	1
3.3 LA14	Table 3.3-3 Function 4.a.1 and Action 23	Requirements for the individual manual isolation function for the main steam isolation valves.	TRM	\$50.59	1, 3
3.3 LA15	Table 3.3-3 Function 6.a, Table 3.3-4 Function 6.a, Table 4.3-2 Function 6.a	Requirements for the manual initiation function for the auxiliary feedwater pumps.	TRM	\$50.59	1, 3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.3 LA16	Table 3.3-4 Notes * and **	Details for performing Channel Calibrations of the steam line pressure-low and the steam line pressure-negative rate-high trip setpoints.	Bases	ITS 5.5.14	3
3.3 LA17	Tables 3.3-6 and 4.3-3	Equipment identification numbers for radiation monitoring instruments.	Bases	ITS 5.5.14	1
3.3 LA18	Table 3.3-6 Action 27	Requirement to submit a Special Report to the Commission when the Control Room outside air intake radioactivity monitor is inoperable more than 30 days.	TRM	\$50.59	3
3.3 LA19	Table 3.3-6 Note *, Table 4.3-3 Note *, 3.9.12 Actions	Requirements to have the radioactivity-high and criticality monitors Operable with fuel stored in the Fuel Handling Building (FHB) and actions regarding crane operation with loads over the spent fuel pool with FHB inoperabilities.	TRM	\$50.59	1, 2
3.3 LA20	3.9.12 Action A	Operability and design details of the FHB Ventilation System.	Bases	ITS 5.5.14	1
3.3 LA21	Table 3.3-6 Action 29	Requirement to provide a portable continuous radiation monitor in the spent fuel pool area with a radioactivity-high and criticality monitor inoperable.	TRM	\$50.59	3
3.3 LA22	LCO 3.3.3.5	Design and Operability details of the Remote Shutdown System.	Bases	ITS 5.5.14	1
3.3 LA23	Not used.				
3.3 LA24	3.3.3.6 Action C, Tables 3.3-10 and 4.3-7	Listing of instruments and related design information and surveillance requirements for Post-Accident Monitoring (PAM) instrumentation which do not meet Regulatory Guide 1.97 Type A or Category I criteria.	TRM	\$50.59	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.3 LA25	Table 3.3-3 Functions 2.a and 3.b.1	Details of ESFAS instrument channel design.	Bases	ITS 5.5.14	1
3.3 LA26	Table 4.3-7 Note ***	Details for performing Channel Calibrations of the PAM containment high range area radiation monitor.	Bases	ITS 5.5.14	3
3.3 LA27	4.6.4.1	Requirements to perform an Analog Channel Operational Test every 92 days and to check that the monitor is in standby mode for the hydrogen monitors.	TRM	§50.59	3
3.3 LA28	4.6.4.1	Details for performing Channel Calibrations of the hydrogen monitors.	Bases	ITS 5.5.14	3
3.3 LA29	Not used.				
3.3 LA30	Table 3.3-9	Design details regarding the readout location and total number of channels for the Remote Shutdown System.	Bases	ITS 5.5.14	1
3.3 LA31	Table 4.3-1 Notes 11, 14, and 16	Details for performing TADOTs for the reactor trip breakers, reactor trip bypass breakers, and their associated shunt trip and undervoltage trip mechanisms.	Bases	ITS 5.5.14	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.3, Instrumentation</b>			
3.3 M1	CTS both explicitly and implicitly requires that the Modes or conditions applicable to specific instrumentation functions be exited when the associated actions are not met or an associated action is not provided. These general actions were replaced by specific shutdown actions with more restrictive completion times and by compensatory actions for reducing the risk of accidents that would require system actuation.	3.3.1, 3.3.2, and 3.3.7	Tables 3.3-1, 3.3-3, and 3.3-6, 3.0.3
3.3 M2	The time required for performing maintenance and testing to restore the RTB diverse trip feature to Operable status was limited to 2 hours.	3.3.1 Action N Note 2	Table 3.3-1 Action 12.a
3.3 M3	CTS allows Modes 1 and 2 to be entered without the initial performance of the comparison of calorimetric to excore power indication having been performed, but does not specify when the surveillance must be performed. This allowance was replaced by a requirement to perform the surveillance within 12 hours of reaching 15% Rated Thermal Power (RTP).	SR 3.3.1.2 Note 2	Table 4.3-1 Note 2
3.3 M4	An action was included in the Boron Dilution Protection System Specification to address the condition of two trains inoperable due to the refueling water storage tank boron concentration not within limits.	3.3.9 Action C	3.1.2.7 Actions
3.3 M5	CTS allows Modes 1 and 2 to be entered without the initial performance of the calibration of excore detectors from incore detector measurements having been performed, but does not specify when the surveillance must be performed. This allowance was replaced by a requirement to perform the surveillance within 24 hours of reaching 75% RTP.	SR 3.3.1.6 Note	Table 4.3-1 Note 6
3.3 M6	The applicability for the turbine trip and feedwater automatic isolation function to be Operable was expanded to include Mode 3 because of the potential for a secondary side line break. Applicable default actions to place the unit in a Mode in which the LCO does not apply were revised to specify Mode 4 within 18 hours.	Table 3.3.2-1 Functions 5.a and 5.b, 3.2.2 Actions D and G	Table 3.3-3 Functions 5.a and 5.b

(By) - Byron specific  
(Bw) - Braidwood specific



**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.3 M7	An action was included in the Reactor Trip System Specification to explicitly address the condition of two inoperable source range monitors in Mode 2 below the P-6 interlock. The action requires the core be immediately placed in a conservative condition rather than allowing an hour to initiate unit shutdown actions.	3.3.1 Action I	Table 3.3-1 Actions
3.3 M8	The applicability for the Control Room radiation monitor actuation function to be Operable was expanded to include "during movement of irradiated fuel assemblies" because of the potential for a fuel handling accident when the reactor core is defueled.	Table 3.3.7-1 Function 1	Table 3.3-6 Function 5
3.3 M9	The setpoint allowable value for the ESFAS grid degraded voltage function was increased to 3793 VAC and 3930 VAC (for Byron and Braidwood, respectively) to ensure adequate voltage is available for equipment to perform their safety related functions in the event of a loss of offsite power.	SR 3.3.5.2	Table 3.3-4 Function 8.b

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.4, Reactor Coolant Systems</b>			
3.4 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.4	3/4.1, 3/4.2, 3/4.3, 3/4.4, 3/4.5, 3/4.10
3.4 A2	Obsolete, cycle-specific limits regarding reactor coolant system (RCS) total flow rate, steam generator water level, and reactor coolant Dose Equivalent I-131 were deleted.	LCO 3.4.1.c, SR 3.4.5.2, SR 3.4.6.2, LCO 3.4.7.b, SR 3.4.7.2, SR 3.4.16.2, Figure 3.4.16-1	3.2.3.a, 4.4.1.2.2, 4.4.1.3.2, 3.4.1.4.1.b, 3.4.8.a, Figure 3.4-2, Table 4.4-4 Note ****
3.4 A3	Exception to the provisions of CTS 4.0.4 was removed for the associated RCS flow rate surveillances. Wording and format of the surveillance and ITS SR 3.0.4 make such exceptions unnecessary.	SR 3.4.1.4 Note, 3.0.4	4.2.3.1
3.4 A4	Action to restore RCS operating loop temperature to within limit was deleted since the option to restore out of limit conditions always applies and does not need to be explicitly stated.	3.4.2 Action A	3.1.1.4 Actions
3.4 A5	Footnote reference to Special Test Exception (STE) Specification 3.10.3 was deleted in conformance with the ITS which presents these STE requirements in the ITS Specifications to which they apply.	3.4.2 Applicability	3.1.1.4 Applicability

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.4 A6	Footnote reference to STE Specification 3.10.4 was deleted in conformance with the ITS which presents these STE requirements in the ITS Specifications to which they apply.	3.4.4 Applicability	3.4.1.1 Applicability
3.4 A7	Footnote reference to STE Specification 3.10.4 was deleted in conformance with the ITS which presents these STE requirements in the ITS Specifications to which they apply.	3.4.5 Applicability	3.4.1.2 Applicability
3.4 A8	Since the condition "when no reactor coolant or Residual Heat Removal (RHR) loop in operation" implies both required loops are inoperable, the applicable Actions were applied to each condition for clarity. The Action to suspend all operations involving a reduction in boron concentration of the RCS was applied to the condition when no required reactor coolant or RHR loop is in operation as well as when both required loops are inoperable.	3.4.6 Actions A and C	3.4.1.3 Action b
3.4 A9	The LCO was revised to clarify that the pressurizer heaters are required to have a redundant emergency power supply capability, which is consistent with the CTS surveillance requirement to demonstrate the cross-tie to the emergency safety feature (ESF) power supply. See 3.4 A32.	LCO 3.4.9 SR 3.4.9.3	3.4.3 4.4.3.3
3.4 A10	An explicit allowance for separate condition entry for each pressurizer power operated relief valve (PORV) and each block valve was included to clarify current practice for tracking allowable outage times for each inoperable component.	3.4.11 Actions Note 1	3.4.4 Actions
3.4 A11	Actions to restore pressurizer PORV(s) or block valves were deleted since the option to restore inoperable components currently exists and does not need to be explicitly stated.	3.0.2 Actions	3.4.4 Actions a, b, c, and d

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.4 A12	Whenever a loop isolation valve is discovered closed, compliance with the LCO cannot be reestablished in the Modes of applicability. These requirements are clarified by substituting the phrase "maintain the valves closed" for "suspend startup of the isolated loop" and by adding a note that shutdown of the unit to Mode 5 must be completed.	3.4.17 Action B	3.4.1.5.1 Actions
3.4 A13	The frequency for verifying the capacity of each group of pressurizer heaters was changed from "each refueling outage" to the equivalent "18 months," consistent with the length of a fuel cycle.	SR 3.4.9.2	4.4.3.2
3.4 A14	The phrase "water level not within limit" was used to clarify the intent of the CTS words with the pressurizer "otherwise inoperable."	3.4.9 Action A	3.4.3 Action b
3.4 A15	LCO and Action requirements for steam generator (SG) Operability were incorporated in other ITS Specifications. The specific surveillance requirements were incorporated in the Steam Generator Tube Surveillance Program and replaced by a surveillance to verify steam generator tube integrity in accordance with this Program.	SR 3.4.4, SR 3.4.5.2, SR 3.4.6.2, SR 3.4.13.2, 5.5.9	3/4.4.5
3.4 A16	The requirement to enter LCO 3.0.3 was explicitly stated as an Action for the condition of all required RCS Leakage Detection System monitors being inoperable to clarify current requirements.	3.4.15 Action D	3.4.6 Actions 3.0.3
3.4 A17	Obsolete, cycle-specific surveillance extension allowance for the 18 month Channel Calibration of the Containment Sump Monitor was deleted.	SR 3.4.15.3	4.4.6.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.4 A18	The exception to Specification 4.0.4 allowing entry into Modes 3 or 4 without performing leakage testing of the RCS pressure isolation valves (PIV) was reworded as a note stating the surveillance is only required to be performed in Modes 1 and 2.	SR 3.4.14.1 Note 1	4.4.6.2.2
3.4 A19	Explicit allowance was included for separate condition entry for each flow path with leakage from one or more RCS PIVs not within its leakage limit. Also, direction was included to enter the applicable LCOs for systems made inoperable by an inoperable PIV. These clarifications make explicit these existing, but implied CTS requirements for inoperable PIVs.	3.4.14 Actions Notes 1 and 2	3.4.6.2 Actions
3.4 A20	Not used.		
3.4 A21	Requirements to protect the RCS from overpressurization by safety injection (SI) or charging pump operation during shutdown Modes were reworded to address the pumps' capability of injecting into the RCS rather than the pumps' inoperability.	LCO 3.4.12.a and b, SR 3.4.12.1, SR 3.4.12.2	4.5.3.2
3.4 A22	Not used.		
3.4 A23	The LCO for RCS loops in Modes 1 and 2 was revised to clarify that four loops be Operable as well as in operation because other Specifications require reactor coolant pumps and steam generators to be Operable.	LCO 3.4.4	3.4.1.1
3.4 A24	The frequency for determining the precision heat balance measurement was changed from "each refueling outage" to the equivalent "18 months," consistent with the length of a fuel cycle.	SR 3.4.1.4	4.2.3.5

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.4 A25	Surveillance and Action requirements were revised to clarify that only RHR loops "required" to be in operation have to be verified to be operating, by referencing the LCO allowance for the pumps to be removed from operation for limited periods.	SR 3.4.6.1, LCO 3.4.7 Notes 1 and 2, 3.4.7 Actions, SR 3.4.7.1, SR 3.4.8.1	4.4.1.3.3, 3.4.1.4.1 Actions, 4.4.1.4.1.2, 4.4.1.4.2
3.4 A26	The phrase "with power removed" was deleted from the allowance that PORV block valves need not be tested if they are closed in accordance with specified Action requirements because opening the block valve by any means is not allowed while in this condition; thus , the phrase is unnecessary.	SR 3.4.11.1 Note 1	4.4.4.2
3.4 A27	Not used.	3.4.11 Actions	3.4.4 Actions
3.4 A28	Not used.		
3.4 A29	Not used.		
3.4 A30	Actions pertaining to inoperable PORVs were reformatted for clarification to be conditional upon the capability of the valve being manually cycled rather than upon excessive seat leakage. This is consistent with the intent of the CTS action requirements..	3.4.11 Actions A, B and E	3.4.4 Actions a, b and c
3.4 A31	The allowance that reactor coolant or RHR pumps may be deenergized under certain conditions was reworted for clarification to allow the pumps to be "removed from operation."	LCO 3.4.5 Note, LCO 3.4.6 Note 1, LCO 3.4.7 Note 1, LCO 3.4.8 Note 1	3.4.1.2 Note, 3.4.1.3 Note, 3.4.1.4.1 Note, 3.4.1.4.2 Note

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.4 A32	The surveillance to demonstrate the Operability of the "cross-tie" for the pressurizer heaters to the ESF power supply was reworded for clarification to demonstrate the heaters' "capability to be powered by" the ESF power supply.	SR 3.4.9.3	4.4.3.3
3.4 A33	Explicit statement that inservice inspection and testing activities shall be in addition to other specified SRs was deleted as an unnecessary iteration of current requirements.	3.4.11 SR 3.4.12.5	4.4.4.1, 4.4.9.3.2.c
3.4 A34	Requirements were reformatted to more clearly specify the appropriate Actions to take when a required RHR loop or one or more required steam generators are inoperable in Mode 5 with RCS loops filled.	3.4.7 Actions B and C	3.4.1.4.1 Action a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.4, Reactor Coolant Systems</b>				
3.4 L1	Requirements to verify through incore flux mapping and RCS total flow rate comparison that the combination of Reactor Coolant System(RCS) total flow rate and Nuclear Enthalpy Rise Hot Channel Factor ( $F_{\Delta H}^N$ ) are within limits were eliminated consistent with STS. Individual limits for RCS total flow rate and $F_{\Delta H}^N$ were retained in separate Specifications.	LCO 3.2.2, LCO 3.4.1.c	3.2.3 Actions b and c, 4.2.3.2, 4.2.3.3	III, VIII
3.4 L2	The explicit requirement to determine RCS temperature to be $\geq 550^\circ\text{F}$ within 15 minutes prior to achieving reactor criticality was removed since SR 3.0.4 requires the performance of this surveillance prior to entering these conditions specified in the Applicability.	SR 3.4.2.1, SR 3.0.4	4.1.1.4.a	VI
3.4 L3	Requirements were revised to base the number of operating RCS loops on the rod withdrawal capability of the Rod Control System rather than on the position of the Reactor Trip System breakers (RTBs) since methods other than opening the RTBs are available for preventing an inadvertent rod withdrawal.	LCO 3.4.5, 3.4.5 Actions A, B and C	3.4.1.2, 3.4.1.2 Actions b and c	I, III
3.4 L4	The completion time for reducing Thermal Power when RCS total flow rate is outside its limit was relaxed from 4 hours to 6 hours to allow for an orderly transition to a Mode in which the limit is not applicable.	3.4.1 Action B	3.2.3 Action a.2	IV
3.4 L5	Not used.			

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L6	An allowance was included for separate condition entry for each RCS loop isolation valve discovered either closed or with power available to its operator. Also, CTS implicitly requires that, when one or more loop isolation valves have power available, the unit be placed in a Mode in which the LCO does not apply. Required Actions were relaxed to allow 30 minutes to restore compliance with the LCO by removing power from the valve operators.	3.4.17 Actions Note and Action A	3.4.1.5.1 Actions, 3.0.3	III
3.4 L7	The completion time for restoring an RCS pressure isolation valve (PIV) to within its leakage limit was relaxed from 4 hours to indefinitely provided the compensatory Actions are taken to isolate the high pressure portion of the affected system from the low pressure portion with a specified isolation valve within 4 hours and with a second specified isolation valve within 72 hours.	3.4.14 Action A	3.4.6.2 Action c	IV
3.4 L8	Not used.			
3.4 L9	The CTS requirement to maintain both hot and cold legs isolation valves closed until the isolated loop's cold leg temperature is within limits was reformatted and relaxed to require closure of only the cold leg isolation valve since this adequately prevents a cold water reactivity event.	3.4.18 Action B	3.4.1.5.2 Action	III
3.4 L10	An allowance was added so that the surveillance to perform a Channel Operational Test on each pressurizer power operated relief valve (PORV) actuation channel need not be performed until 12 hours after decreasing RCS cold leg temperature to $\leq 350$ degrees F.	SR 3.4.12.7 Note, SR 3.0.4	4.4.9.3.1.a	VI

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L11	The completion time for reducing power to $\leq 5\%$ RTP when any Departure from Nucleate Boiling (DNB) parameter limit is exceeded was relaxed from 4 hours to 6 hours to allow for an orderly power reduction to Mode 2.	3.4.1 Action B	3.2.5 Actions	IV
3.4 L12	CTS 3.0.3 requires that, with only one RCS loop in operation and the RTBs in the closed position (Rod Control System capable of rod withdrawal) and if the Action to open the RTBs is not completed within the required time, the unit be placed in a Mode (4) in which the LCO does not apply. Required Actions were relaxed to allow continued operation in Mode 3 provided three compensatory Actions are taken immediately.	3.4.5 Action C	3.4.1.2 Actions, 3.0.3	III
3.4 L13	Not used.			
3.4 L14	The frequency for determining the boron concentration of an isolated loop to be greater than the boron concentration of the operating loops prior to opening the valves of the isolated loop was relaxed from 2 hours to 4 hours to allow adequate time to sample and confirm the analysis results.	SR 3.4.18.2	4.4.1.5.2.2	VI
3.4 L15	An exception was included to relax the surveillance requirement that RCS PIV leakage be verified whenever the valves are actuated. A note allows PIVs actuated during surveillance testing need not be tested more than once if a repetitive testing loop cannot be avoided.	SR 3.4.14.1 Note 2	4.4.6.2.2	VI

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L16	An exception was included to relax the requirement that a maximum of one centrifugal charging pump may be capable of injection. A note was included in the LCO to allow two pumps capable of injecting into the RCS for $\leq 15$ minutes during pump swap operations.	3.4.12 Action A Note	3.5.3.a	I, V
3.4 L17	Because of the availability of diverse methods of RCS leakage detection, the requirement that both containment atmosphere gaseous and particulate radiation monitors be Operable was relaxed so that only one of the containment atmosphere radioactivity monitors is required Operable.	LCO 3.4.15, SR 3.4.15.1, SR 3.4.15.2, SR 3.4.15.4	Table 3.3-6 Items 3 and 4, 3.4.6.1.a and c, 4.4.6.1.a	I, V
3.4 L18	The minimum boron concentration to which an isolated loop must be charged prior to unisolating it was changed from the concentration of the operating loops to that required by shutdown margin (SDM) calculation. This change allows an isolated loop to be unisolated even if the boron concentration of the isolated loop is less than the operating loops provided that the isolated loop concentration meets the applicable SDM requirements.	LCO 3.4.18.a, SR 3.4.18.2	3.4.1.5.2.a, 4.4.1.5.2.2	I, V
3.4 L19	With both the containment atmosphere gaseous and particulate radiation monitors inoperable, CTS requires the restoration of one of the monitors within 72 hours. In addition, both an RCS inventory balance and grab samples of containment atmosphere are periodically required as compensatory Actions. These Actions were relaxed to require restoration of one of the monitors within 30 days and performance of either of the compensatory Actions.	3.4.15 Action B	3.4.6.1 Actions c.1 and c.2	III, IV

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L20	Exceptions were included to relax the requirement that all the monitors of the RCS Leakage Detection System must be Operable prior to entering or changing Modes of applicability. These changes allow Mode changes if either the containment sump monitor or either of the containment atmosphere radioactivity monitors are inoperable provided that the required compensatory Actions are performed daily.	3.4.15 Actions A and B Note	3.0.4, 3.4.6.1	II, III
3.4 L21	With the containment sump flow monitor inoperable, the requirement to restore the monitor to Operable status within 7 days was relaxed to allow 30 days for restoration provided the compensatory Action to perform a water inventory balance is performed daily.	3.4.15 Required Action A.2	3.4.6.1 Action b	IV
3.4 L22	The interval for performing an RCS water inventory balance was relaxed from once per 8 hours to once per 24 hours considering the availability of diverse methods of detecting RCS leakage.	3.4.15 Required Actions A.1 and B.1.2	3.4.6.1 Action c.3	IV
3.4 L23	CTS 3.0.3 requires that, with two required RCS loops inoperable, the unit be placed in a Mode (4) in which the LCO does not apply. An explicit condition was included to allow continued operation in Mode 3 provided three compensatory Actions are taken immediately.	3.4.5 Action F	3.4.1.2 Actions, 3.0.3	III
3.4 L24	The surveillance to perform an RCS water inventory balance once per 72 hours was modified to allow its initial performance 12 hours after establishment of steady state operation rather than requiring the surveillance to be met prior to entering this power condition. Actions requiring the periodic performance of this surveillance were also provided with this allowance for their initial performance.	SR 3.4.13.1, 3.4.15 Required Actions A.1 and B.1.2	4.4.6.2.1.d, 3.4.6.1 Action c.3	VI

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L25	CTS imposes a maximum leakage rate of 1.0 gpm (notwithstanding the provisions for RHR suction motor operated valves in Table 3.4-1) from any RCS PIV. A more meaningful limitation based on valve size was used to prevent unwarranted repair on larger valves.	SR 3.4.14.1	3.4.6.2.f, Table 3.4-1 Notes	V
3.4 L26	With the pressurizer otherwise inoperable (water level not within limit), the Action requirements were revised to place the unit in Mode 3 with all rods fully inserted and the Rod Control System incapable of rod withdrawal rather than Mode 3 with the RTBs open since methods other than opening the RTBs are available for preventing an inadvertent rod withdrawal.	3.4.9 Action A	3.4.3 Action b	III
3.4 L27	The 18 month surveillance to operate the PORVs through a complete cycle of travel was revised to eliminate the explicit requirement to perform the test in Mode 3 or 4 and requires, instead, the surveillance to be "current" upon entering Modes 1 and 2. STS SR 3.0.4 and Generic Letter 90-06 continue to require its performance in Mode 3 or 4.	SR 3.4.11.2 Note	4.4.4.1.c	VI
3.4 L28	The default Action to reduce the RCS temperature and pressure to < 200°F and < 500 psig, respectively, when any RCS temperature or pressure limit is not restored within 30 minutes was relaxed to place the unit in Mode 5. The temperature in this Mode is equivalent but pressure may exceed 500 psig.	3.4.3 Action B	3.4.9.1 Actions	III
3.4 L29	Not used.			

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L30	The applicability has been revised to delete the requirements to comply with the LCO and Actions and to periodically verify the RCS specific activity within limits during Mode 3 with RCS temperature < 500°F and Modes 4 and 5 due to the unlikely possibility of a steam generator tube rupture during these Modes. Similarly, the sampling and analysis requirements when the specific activity of the reactor coolant exceeds 100/E $\mu\text{Ci/gram}$ were deleted since exceeding this limit now requires promptly placing the unit in a Mode in which the specific activity limits do not apply.	3.4.16	3/4.4.8, Table 4.4-4	II, III
3.4 L31	Not used.			
3.4 L32	An exception was included to relax the requirement that the Dose Equivalent I-131 specific activity must be within limits prior to entering or changing Modes of applicability. This change allows entry into the applicable Modes while relying on the required Actions even though the Actions may eventually require exiting the applicable Modes if the limits are not restored within specified times.	3.4.16 Action A Note	3.4.8, 3.0.4	II, III
3.4 L33	Not used.			
3.4 L34	The frequency interval for verifying the reactor coolant gross specific activity is within limits was relaxed from 72 hours to 7 days because this interval is adequate to trend this parameter.	SR 3.4.16.1	4.4.8, Table 4.4-4 Item 1	VI

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L35	The exception to CTS Specification 4.0.3 was eliminated for the surveillance to determine the RCS total flow rate by precision heat balance after each fuel loading. This change relaxes the frequency to allow the missed surveillance to be performed in the 24 hour delay period.	SR 3.4.1.4, SR 3.0.3	4.2.3.5	VI
3.4 L36	Whenever an RCS operating loop temperature is not within limit, the Action to place the unit in Mode 3 was relaxed to place the unit in Mode 2 with $k_{eff} < 1.0$ to be consistent with the Applicability. Also the time specified for completing this Action was relaxed from 15 minutes to 30 minutes to allow for an orderly unit shutdown.	3.4.2 Action A	3.1.1.4 Actions	III, IV
3.4 L37	An exception was taken to the LCO requirement that at least one Residual Heat Removal (RHR) loop shall be in operation in Mode 5 with loops filled. The exception allows all RHR loops to be removed from operation during the transition from Mode 5 to Mode 4 when at least one RCS loop is in operation. This change provides equivalent RCS circulation for mitigation of a boron dilution event and an orderly heatup transition to the next Mode.	LCO 3.4.7 Note 4	3.4.1.4.1	I
3.4 L38	The requirements for pressurizer safety valves was relaxed to allow entry into the Mode of applicability without the lift settings having been verified within limits in order to set them at nominal operating temperature and pressure. 54 hours following entry into Mode 3 is allowed for this adjustment provided the valves have had a preliminary cold setting.	LCO 3.4.10 Note	3.4.2.2 Note *	I, VI

**Less Restrictive Change Categories**

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| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.4 L39	The Modes in which sampling and analysis of reactor coolant for isotopic Iodine is required to be performed following power level changes $\geq 15\%$ RTP within a 1 hour period was relaxed from Modes 1, 2, and 3 to Mode 1 where fuel failure is more apt to occur and where RTP changes of this magnitude are of concern.	SR 3.4.16.2	Table 4.4-4 Item 4.b	VI

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific



**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.4, Reactor Coolant Systems</b>					
3.4 LA1	4.4.1.1	Information describing the characteristics of operating reactor coolant loops.	Bases	ITS 5.5.14	2
3.4 LA2	3.4.1.2	Design details listing the components associated with each reactor coolant loop for Operability.	Bases	ITS 5.5.14	1
3.4 LA3	4.4.1.2.3, 4.4.1.3.3, 4.4.1.4.1.2, 4.4.1.4.2	Information describing the characteristics of operating reactor coolant or Residual Heat Removal (RHR) loops.	Bases	ITS 5.5.14	2
3.4 LA4	3.4.1.3	Design details listing each RHR loop and the components associated with each reactor coolant loop for Operability.	Bases	ITS 5.5.14	1
3.4 LA5	Not used.				
3.4 LA6	4.4.3.2, 4.4.3.3	Details describing the testing methods used to demonstrate pressurizer heater Operability.	Bases	ITS 5.5.14	3
3.4 LA7	Table 4.4-4 Note **	Details describing the method used to analyze reactor coolant samples for gross radioactivity.	Bases	ITS 5.5.14	3
3.4 LA8	4.4.4.1.a	Surveillance requirement to perform an 18 month Channel Calibration of the pressurizer power operated relief valves actuation instrumentation.	TRM	\$50.59	3

**Relocated Detail Types**

- |                                   |   |
|-----------------------------------|---|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements                |
| 2 Description of System Operation | 4 Surveillance Requirements for indication only instrumentation |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.4 LA9	3.4.6.1 Action a	Parameters for which containment atmosphere must be analyzed when containment radiation monitors are inoperable.	Bases	ITS 5.5.14	3
3.4 LA10	3.4.6.2.f Note *	Details for adjusting allowable pressurizer isolation valve (PIV) leakage when tested at Reactor Coolant System (RCS) pressures other than that specified.	TRM	§50.59	3
3.4 LA11	Table 3.4-1	Listing of RCS PIVs valve identification numbers and functions.	Bases	ITS 5.5.14	1
3.4 LA12	Not used.				
3.4 LA13	Not used.				
3.4 LA14	4.5.3.2, 3/4.5.4.1	Details describing the method used to demonstrate that the safety injection (SI) and charging pumps are incapable of injecting into the RCS during Low Temperature Overpressure Protection (LTOP) conditions.	Bases	ITS 5.5.14	3
	4.5.4.2.1	Details describing the method used to demonstrate that the SI pumps are incapable of injecting into the RCS during LTOP conditions.	Bases	ITS 5.5.14	3
3.4 LA15	4.4.9.3.2	Valve identification numbers used for demonstrating Operability of RHR suction relief valves when used for LTOP.	Bases	ITS 5.5.14	3
3.4 LA16	Not used.				
3.4 LA17	3.2.3	Requirement for maintaining four RCS loops in operation.	Bases	ITS 5.5.14	2
3.4 LA18	4.2.3.5	Method for determining RCS total flow rate.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |   |
|-----------------------------------|---|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements                |
| 2 Description of System Operation | 4 Surveillance Requirements for indication only instrumentation |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.4 LA19	4.2.3.4	Surveillance requirement to perform an 18 month Channel Calibration of the RCS total flow rate indicators.	TRM	§50.59	4
3.4 LA20	Not used.				
3.4 LA21	3.4.6.2.c	Excepting isolated steam generators from RCS leakage limits.	Bases	ITS 5.5.14	3
3.4 LA22	3.4.9.1 Actions	Requirement that an engineering evaluation be performed to determine the effects of a temperature or pressure excursion on the structural integrity of the RCS.	Bases	ITS 5.5.14	3
3.4 LA23	4.4.6.1.c	Requirement to periodically verify the oil separator portion of the containment floor drain collection sump has been filled.	TRM	§50.59	3
3.4 LA24	4.4.6.2.1.a, 4.4.6.2.1.b, 4.4.6.2.1.e	Surveillance requirements for monitoring RCS leakage detection indicators.	TRM	§50.59	4
3.4 LA25	3.4.9.3 Action e	Requirement to submit a Special Report to the Commission in the event that either the pressurizer power operated relief valves, the RHR suction relief valves, or the RCS vents are used to mitigate an RCS pressure transient.	TRM	§50.59	3
3.4 LA26	4.4.6.2.2.c	Requirement to demonstrate each RCS PIV Operable by verifying leakage to be within its limit prior to returning the valve to service following maintenance, repair, or replacement.	TRM	§50.59	3
3.4 LA27	Table 3.3-6, Table 4.3-3	RCS leakage detection instrumentation identification numbers for the containment gaseous and particulate radioactivity monitors.	Bases	ITS 5.5.14	1

**Relocated Detail Types**

- |                                   |   |
|-----------------------------------|---|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements                |
| 2 Description of System Operation | 4 Surveillance Requirements for indication only instrumentation |

(By) - Byron specific

(Bw) - Braidwood specific

Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.4 LA28	3.4.6.1 b, 4.4.6.1.b	Details of the RCS leakage detection systems regarding the methods used to monitor leakage into the containment floor drain sump and the reactor cavity sump.	Bases	ITS 5.5.14	1, 2
3.4 LA29	4.1.1.4.b	Requirement to verify the RCS average temperature is at least 550°F once per 30 minutes when the reactor is critical and RCS temperature is less than 557°F with the $T_{avg}-T_{rel}$ Deviation Alarm not reset.	TRM	\$50.59	4

Relocated Detail Types

- |                                   |   |
|-----------------------------------|---|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements                |
| 2 Description of System Operation | 4 Surveillance Requirements for indication only instrumentation |

(By) - Byron specific

(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.4, Reactor Coolant Systems</b>			
3.4 M1	Surveillances were added to require verification of correct breaker alignment and indicated power available to the required Residual Heat Removal (RHR) pump that is not in operation should it need to be placed in operation.	SR 3.4.7.3, SR 3.4.8.2	N/A
3.4 M2	The restrictions under which an RHR pump may be de-energized were revised to include a prohibition of any draining operations that would further reduce the Reactor Coolant System (RCS) water volume.	LCO 3.4.8 Note 1.c	3.4.1.4.2 Note **
3.4 M3	The allowances for removing all required RCS pumps from operation were revised to limit the amount of time the RCS is without forced cooling to $\leq 1$ hour per 8 hours.	LCO 3.4.5 Note, LCO 3.4.6 Note 1, LCO 3.4.7 Note 1	3.4.1.2, 3.4.1.3, 3.4.1.4.1
3.4 M4	With the RHR System suction isolation valve interlock function inoperable, the CTS Emergency Core Cooling System Specification requires restoration of the RHR subsystem to Operable within 7 days. An Action specific to the interlock function was added to require isolating the RHR flow path within 4 hours to protect RHR components from overpressurization.	3.4.14 Action B	3.5.2 Action a, 3.4.6.2 Actions
3.4 M5	An Action to shutdown the unit to a Mode in which the LCO does not apply when two or more pressurizer valves are inoperable was included rather than defer to LCO 3.0.3 for this requirement. The result is a completion time of 1 hour less to have the unit in Mode 4.	3.4.10 Action B	3.0.3, 3.4.2.2 Actions
3.4 M6	The completion time for restoring an inoperable pressurizer power operated relief valve (PORV) was reduced to 72 hours consistent with other similar component restoration times.	3.4.11 Action B	3.4.4 Action b
3.4 M7	The Specification for Low Temperature Overpressure Protection (LTOP) was revised to add LCOs, Actions, and Surveillance Requirements for conditions in which the RCS could be overpressurized from unisolated accumulators, safety injection (SI) or charging pumps, or from any other reason LTOP becomes inoperable.	3.4.12, SR 3.4.12.3	3/4.4.9.3

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(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.4 M8	With a SI pump(s) discovered Operable in the applicable Modes and conditions, the Action to restore the SI pump(s) to inoperable status within 4 hours was changed to immediately initiate action to verify no SI pumps are capable of injecting into the RCS.	3.4.12 Action B	3.5.4.1 Actions
3.4 M9	The frequency for verification of RCS average temperature was changed to every 12 hours while in the applicable Modes and conditions rather than every 30 minutes only when RCS average temperature is $\leq 557^{\circ}\text{F}$ with the $T_{\text{avg}}-T_{\text{ref}}$ deviation alarm not reset.	SR 3.4.2.1	4.1.1.4.b
3.4 M10	A completion time of 72 hours was imposed on the Action to determine that the RCS remains acceptable for continued operation after the RCS temperature or pressure limit has been exceeded in Modes 1, 2, 3, or 4.	3.4.3 Action A	3.4.9.1 Action
3.4 M11	The Action to restore RCS temperature and/or pressure to within limit within 30 minutes was changed for Modes other than 1, 2, 3, or 4 to require immediate action to restore the parameter(s) to within limit and to determine that the RCS is acceptable for continued operation before entering Mode 4.	3.4.3 Action C	3.4.9.1 Actions
3.4 M12	Special Test Exception to allow reactor criticality under no flow conditions was deleted. The Specification is no longer needed since this testing was only necessary for initial unit startup with a new core.	N/A	3/4.4.10.4
3.4 M13	Specifications for RHR operation in Mode 5 conditions do not specify Actions for both loops of RHR inoperable. Actions were added to immediately suspend all operations involving a reduction of RCS boron concentration and to immediately initiate restoration of one RHR loop to Operable status.	3.4.7 Action D, 3.4.8 Action C	3.4.1.4.1 Actions, 3.4.1.4.2 Actions
3.4 M14	If unable to restore RCS total flow rate to within limit within 2 hours in Mode 1, the Action to reduce Thermal Power was replaced with the Action to place the unit in a Mode in which the LCO does not apply.	3.4.1 Action B	3.2.3 Action a.2

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**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.4 M15	A time period of 7 days after reaching 90% Rated Thermal Power was stipulated for determining RCS total flow rate by precision heat balance measurement rather than prior to completion of Physics Tests.	SR 3.4.1.4 Note	4.2.3.5
3.4 M16	A time period of 31 days was imposed for sampling and radioanalysis for RCS $\bar{E}$ after a minimum of 2 effective full power days and 20 days of Mode 1 operation.	SR 3.4.16.3 Note	Table 4.4-4, Note *
3.4 M17	Not used.		
3.4 M18	To provide additional assurance that low temperature overpressurization events are prevented, the Applicability was revised so that no SI pumps may be capable of injecting into the RCS, regardless of the pressurizer level.	3.4.12 Applicability	3.5.4.1 Applicability
3.4 M19	The surveillance frequency "in accordance with the Inservice Testing (IST) Program" for verifying the leakage from each RCS pressure isolation valve is within limits was added for consistency with STS.	SR 3.4.14.1	4.4.6.2.2.a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.5, Emergency Core Cooling Systems</b>			
3.5 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.5	Sections 3/4.4 and 3/4.5
3.5 A2	The phrase "Each Reactor Coolant System accumulator" in the LCO requirement was revised to read "Four ECCS accumulators" shall be Operable.	LCO 3.5.1	3.5.1
3.5 A3(By)	Historical boron concentration limits for the Emergency Core Cooling System (ECCS) accumulators were deleted.	SR 3.5.1.4, SR 3.5.1.5	3.5.1.c.2 and Notes # and **
3.5 A3(Bw)	Historical boron concentration limits for the ECCS accumulators were deleted.	SR 3.5.1.4, SR 3.5.1.5	3.5.1.c.1 and Notes # and **
3.5 A4	The Applicability condition for which the ECCS accumulators are required to be Operable in Mode 3 was changed from "with pressurizer pressure above 1000 psig" to the equivalent condition "with RCS pressure > 1000 psig."	3.5.1 Applicability	3.5.1 Applicability, SR 4.5.1.1.c
3.5 A5	CTS Actions address the condition of one accumulator inoperable due to its isolation valve being closed. The conditions for an ECCS accumulator being inoperable were reformatted such that exclusive Actions associated with accumulator boron concentration not within limits are specified as an exception for Operability rather than a closed isolation valve.	3.5.1 Actions A and B	3.5.1 Actions a and b

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(Bw) - Braidwood specific



**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.5 A6	The requirement to enter the default actions of LCO 3.0.3 to exit the Mode of applicability was explicitly stated as an Action for the condition of two or more ECCS accumulators being inoperable to clarify current requirements.	3.5.1 Action D	3.0.3
3.5 A7	The requirement to verify the boron concentration of the ECCS accumulator solution after each solution volume increase of "greater than or equal to 70 gallons" was changed to the equivalent limit of "≥ 10%." The expression of volume has been changed from gallons to an equivalent percent indicated level to be consistent with the indication available to the operator and the manner in which the increase in volume is verified.	SR 3.5.1.5 Note	4.5.1.1.b
3.5 A8	Details of how power is verified removed from each accumulator's discharge isolation valve were removed from the surveillance and replaced with the requirement to verify power is removed from the valve operator.	SR 3.5.1.6	4.5.1.1.c
3.5 A9	Not used.		
3.5 A10	For the surveillance to verify the specified ECCS subsystem valves are in their proper position, the word "listed" was substituted for the word "indicated" to avoid any confusion regarding the meaning of "indicated."	SR 3.5.2.1	4.5.2.a
3.5 A11	Not used.		
3.5 A12	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.5 A13	The addition of the phrase "that is not locked, sealed, or otherwise secured in position" clarifies the current allowance that ECCS automatic valves administratively secured in their accident position are not required to actuate to perform their safety function and are exempted from the Surveillance Requirement to verify their actuation to the proper position upon a test signal.	SR 3.5.2.5	4.5.2.e.1
3.5 A14	Containment sump "trash racks" was removed as a type of component which must be visually inspected for evidence of structural distress or abnormal corrosion because plant design does not include trash racks.	SR 3.5.2.8	4.5.2.d.2
3.5 A15	The use of "≤" and "≥" were substituted for "between" in defining the limiting values for parameters required for ECCS accumulators and refueling water storage tank (RWST) Operability.	SR 3.5.1.2, SR 3.5.1.3, SR 3.5.1.4, SR 3.5.1.5, SR 3.5.4.4	3.5.1.b, 3.5.1.c.1(By) 3.5.1.c.2(Bw) 3.5.1.d, 3.5.5.b.1(By) 3.5.5.b.2(Bw)
3.5 A16	A Note was added to clarify the existing requirements that the ECCS is considered Operable when a Residual Heat Removal (RHR) train is aligned or operating in the decay heat removal mode, if capable of being manually realigned to the ECCS mode of operation.	LCO 3.5.3 Note	3.5.3.d
3.5 A17	Historical boron concentration limits for the RWST were deleted.	SR 3.5.4.4	3.5.5.b.1(Bw) 3.5.5.b.2(By)
3.5 A18	The Action to reduce Reactor Coolant System (RCS) (seal injection flow) leakage was revised to provide a more specific method for reducing the leakage rate by adjusting the manual seal injection throttle valves.	3.5.5 Action A	3.4.6.2 Action b

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**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.5 A19	The exception to verifying the ECCS accumulators boron concentration when the volume increase makeup source is the RWST and the RWST boron concentration is within the range required for ECCS Operability was clarified by specifying the acceptable RWST boron concentration limits.	SR 3.5.1.5 Note	SR 4.5.1.1.b

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**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.5, Emergency Core Cooling Systems</b>				
3.5 L1	With one accumulator inoperable due to the boron concentration not within limits, the completion time for restoring the concentration to within limits was increased from 1 hour to 72 hours.	3.5.1 Action A	3.5.1 Action a	IV
3.5 L2	With one accumulator not restored to Operable within 1 hour, the Action to shut down the unit to Hot Shutdown (Mode 4) was changed to Mode 3 with RCS pressure $\leq$ 1000 psig, where the Mode of applicability is exited.	3.5.1 Action C	3.5.1 Actions a and b	III
3.5 L3	With one accumulator inoperable due to the isolation valve being closed, the completion time for restoring the accumulator to Operable status by opening the isolation valve was increased from immediately to 1 hour.	3.5.1 Action B	3.5.1 Action b	IV
3.5 L4	RCS leakage (reactor coolant pump seal injection flow) was changed from 40 gpm Controlled Leakage at a RCS pressure of $2235 \pm 20$ psig to a figure providing a range of seal injection flows vs. differential pressure conditions to provide operating flexibility.	3.5.5 Action A, Figure 3.5.5-1	3.4.6.2.e, 4.4.6.2.1	I, V
3.5 L5	An Action was added to allow two trains of ECCS to be inoperable for 72 hours provided 100% of the ECCS flow equivalent to a single Operable train is available. This allows increased flexibility in plant operations under circumstances when components in opposite trains are inoperable.	3.5.2 Action B	3.5.2 Actions, 3.0.3	III

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance frequency              |
| III Relaxation of Action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.5 L6	With one ECCS subsystem not Operable due to an Inoperable centrifugal charging subsystem, the completion time for placing the unit in Mode 5 from Mode 4 was increased from 20 hours to 24 hours to provide additional time for the transition.	3.5.3 Action C	3.5.3 Action a	IV
3.5 L7	The Completion Time to restore the RWST temperature or boron concentration to within limits was increased from 1 hour to 8 hours to provide a more reasonable time to restore these parameters.	3.5.4 Action A	3.5.5 Actions	IV
3.5 L8	The RCS leakage (reactor coolant pump seal injection flow) Specification was changed to remove Mode 4 from the Applicability because seal injection flow is less critical given the reduced RCS pressure in Mode 4 and the TS requirements for decay heat removal in Mode 4.	3.5.5 Applicability, 3.5.5 Action B	3.4.6.2 Applicability, 3.4.6.2 Action b	II, III, IV
3.5 L9	Surveillances to verify that each ECCS automatic valve actuates to its correct position and that each ECCS pump starts on a test signal were changed to allow actual as well as simulated signals for actuation during operation as well as during shutdown. This allows credit for the surveillance if a valid actuation occurs during operation or through post-maintenance testing that satisfies the Surveillance Requirement.	SR 3.5.2.5, SR 3.5.2.6	4.5.2.e	V

**Less Restrictive Change Categories**

- I Relaxation of LCOs and Administrative Controls
- II Relaxation of Applicability
- III Relaxation of Action requirements
- IV Relaxation of Completion Time

- V Relaxation of SR acceptance criteria
- VI Relaxation of Surveillance frequency
- VII Deletion of requirements redundant to regulation
- VIII Deletion of Surveillance Requirements

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(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.5, Emergency Core Cooling Systems</b>					
3.5 LA1	4.5.1.1.c	Details for verifying power removed from accumulator isolation valves.	Bases	ITS 5.5.14	3
3.5 LA2	4.5.1.2	Surveillance to perform a Channel Calibration on each accumulator water level and pressure channel at least once per 18 months.	TRM	§50.59	3
3.5 LA3	3.5.2, 3.5.3	Definition of what constitutes an Operable ECCS subsystem and the minimum requirements for an Operable flowpath for operating and shutdown conditions.	Bases	ITS 5.5.14	1
3.5 LA4	3.5.2.b, 3.5.3.c	Special Report to the Commission when the ECCS actuates and injects into the RCS, including the nozzle usage factor.	TRM	§50.59	3
3.5 LA5	3.5.2.e	Valve numbers for isolating (a portion of) ECCS flowpaths to perform a surveillance.	Bases	ITS 5.5.14	3
3.5 LA6	3.5.2.e	Alternate means of cold leg injection for isolated flow paths while performing check valve leakage testing.	TRM	§50.59	2
3.5 LA7	4.5.2.b.1, 4.5.2.b.3	Details of method to ensure ECCS piping is vented.	Bases	ITS 5.5.14	2
3.5 LA8	4.5.2.c	Visual inspection to verify no loose debris is present in containment.	TRM	§50.59	3
3.5 LA9	4.5.2.e.1, 4.5.2.e.2	Specific test signals used in the performance of ECCS automatic valve and pump actuation surveillances.	Bases	ITS 5.5.14	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.5 LA10	4.5.2.e.2	List of pumps to be verified in the performance of ECCS automatic pump actuation surveillance.	Bases	ITS 5.5.14	3
3.5 LA11	4.5.2.f	Pump discharge criteria for ECCS pumps.	TRM	§50.59	3
3.5 LA12	4.5.2.g.1	Surveillance to verify the correct position of each mechanical position stop for certain ECCS throttle valves following valve stroking operations or maintenance.	TRM	§50.59	3
3.5 LA13	4.5.2.h	Surveillance to perform a flow balance test following the completion of modifications that alter ECCS subsystem flow characteristics.	TRM	§50.59	3
3.5 LA14	4.5.2.g	Design detail of position stops of certain ECCS throttle valves.	Bases	ITS 5.5.14	1
3.5 LA15	3.5.5	Operability details of the RWST design regarding the heat traced portion of the vent path.	Bases	ITS 5.5.14	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.5, Emergency Core Cooling Systems</b>			
3.5 M1	With no ECCS subsystem Operable due to the inoperability of the RHR subsystem, the CTS option to maintain the RCS < 350°F by use of alternate heat removal systems was eliminated.	3.5.3 Action A	3.5.3 Action b
3.5 M2	An exception to Specification 4.0.4 allows the measurement of RCS leakage (seal injection flow) to be performed after reaching a Mode of applicability. A requirement was added that the initial performance of this surveillance must be performed within 4 hours following RCS pressure being stabilized at $\geq 2215$ psig and $\leq 2255$ psig.	SR 3.5.5.1 Note	4.4.6.2.1.c

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**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.6, Containment Systems</b>			
3.6 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.6	1.7, Section 3/4.6
3.6 A2	Containment Integrity was removed as a defined term and is now referred to as containment Operability.	3.6.1	3/4.6.1.1, 1.7
3.6 A3	The Spray Additive System does not contain any power operated valves and, therefore, reference to this type of valve was deleted.	SR 3.6.7.1	4.6.2.2.a
3.6 A4	Explicit requirement to comply with another Specification was deleted in conformance with STS format.	N/A	4.6.1.1.b
3.6 A5	The requirement to perform containment leakage rate testing in accordance with Regulatory Guide 1.163, September 1995 was changed to reference the Containment Leakage Rate Testing Program which contains the same requirement.	SR 3.6.1.1, SR 3.6.2.1, 5.5.16	4.6.1.1.c, 4.6.1.2.a, b, c, d, g & h 4.6.1.3.a, b & d

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.6 A6	Actions notes, an Action, and surveillance notes were added consistent with STS to clarify CTS intent regarding containment air lock Operability requirements and containment entry and exit controls.	3.6.2 Action Notes 1 and 3, 3.6.2 Action NOte 2, 3.6.2 Action B Note 2, 3.6.2 Required Action C.1, SR 3.6.2.1 Notes	3.6.1.2 Actions, 3.6.1.3 Actions, 4.6.1.3
3.6 A7	Explicit allowances were included for separate condition entry for each inoperable air lock and containment isolation valve, consistent with the intent of the CTS.	3.6.2 Actions Note 2, 3.6.3 Actions Note 2	3.6.1.3 Actions, 3.6.3 Actions
3.6 A8	Clarification was provided for proper application of Actions if both doors in an air lock are inoperable consistent with the intent of the CTS.	3.6.2 Action A Note 1	3.6.1.3 Actions
3.6 A9	The Action to restore an inoperable air lock to Operable status was deleted since the option to restore inoperable components is incorporated as part of LCO 3.0.2 and does not need to be explicitly stated.	LCO 3.0.2	3.6.1.3 Action a.1
3.6 A10	The explicit requirement that an inoperable air lock door be repaired prior to the next overall air lock leakage test was deleted since the test (SR 3.6.2.1) cannot be successfully performed with an inoperable door.	SR 3.6.2.1	3.6.1.3 Action a.2
3.6 A11	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.6 A12	Not used.		
3.6 A13	An exception for the 48 inch purge valves was included in the allowance that containment isolation valves may be opened under administrative controls to clarify an inconsistency in CTS.	3.6.3 Actions Note 1	3/4.6.1.7, 4.6.1.1.a
3.6 A14	The explicit allowance that the provisions of Specification 3.0.4 are not applicable was deleted since STS Specification LCO 3.0.4 allows entry into the Modes of applicability when the Actions allow continued operation for an unlimited period of time.	LCO 3.0.4	3.6.1.3 Action a.4
3.6 A15	The terms "purging" and "venting" are no longer used as defined terms in the STS, and thus are decapitalized.	SR 3.6.3.2	1.24, 1.40, 3.6.1.7.b
3.6 A16	A list of specific methods for isolating a penetration was added pertaining to all penetration flow paths with two containment isolation valves. This change clarifies the existing methods for isolating purge system penetrations.	3.6.3 Action A	3.6.1.7 Actions a and b
3.6 A17	Not used.		
3.6 A18	Not used.		
3.6 A19	Action requirements for containment cooling fans and the Containment Spray System were combined and reformatted such that explicit verification of containment spray Operability with regards to containment cooling fan inoperability is unnecessary.	3.6.6 Action C	3.6.2.3 Actions a and b

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.6 A20	The Action to maintain at least one isolation valve Operable in each affected penetration that is open is addressed in STS format by separate Actions for penetrations designed with one and two isolation valves.	3.6.3 Action A 3.6.3 Action C	3.6.3 Action a
3.6 A21	The Action to restore inoperable containment isolation valve(s) to Operable status was deleted since the option to restore inoperable components is incorporated as part of LCO 3.0.2 and does not need to be explicitly stated.	LCO 3.0.2	3.6.3 Action a.1
3.6 A22	Not used.		
3.6 A23	Reference to CTS 4.0.5 for performing surveillances on pumps and valves was revised to reference the equivalent Inservice Testing Program.	SR 3.6.6.4, SR 3.6.3.5	4.6.2.1.b, 4.6.3.3
3.6 A24	The explicit allowance that the provisions of CTS 3.0.4 are not applicable provided the affected penetration is isolated was deleted since STS LCO 3.0.4 allows entry into the Modes of applicability when the Actions allow continued operation for an unlimited period of time.	LCO 3.0.4	3.6.3 Action b
3.6 A25	Explicit allowance was included to use remote manual valves to isolate a penetration consistent with the intent of the CTS.	3.6.3 Action A	3.6.3 Action a.2
3.6 A26	The requirement to enter the default actions of LCO 3.0.3 to exit the Modes of applicability was explicitly included for certain conditions of containment spray and/or containment cooling inoperability.	3.6.6 Action E	3.0.3 3.6.2.1 Actions, 3.6.2.3 Actions,

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.6 A27	The frequency for demonstrating each Hydrogen Recombiner System Operable was changed from "each refueling outage" to the equivalent "18 months."	SR 3.6.8.1	4.6.4.2.a
3.6 A28	Leakage rate acceptance criteria were removed to the Containment Leakage Rate Testing Program.	5.5.16	3.6.1.2 Actions
3.6 A29	A note was included to clarify the CTS requirement to enter LCO 3.6.1 when isolation valve leakage results exceed overall containment leakage rate acceptance criteria.	3.6.3 Actions Note 4	3.6.3 Actions
3.6 A30	Notes were included to clarify which Actions apply to inoperable containment isolation valves depending on the number of valves in the penetration consistent with the reformatting of the CTS.	3.6.3 Actions A, B, and C	3.6.3 Actions
3.6 A31	With containment leakage rates not within limits, the explicit Action to restrict Reactor Coolant System heatup to below 200°F was deleted since default actions (3.6.1.1 Actions & 3.0.3) are comparable.	3.6.1 Actions, SR 3.0.1	3.0.3, 3.6.1.2 Actions
3.6 A32	Cross reference to a Specification limiting containment leakage rates was deleted in conformance to STS format.	N/A	1.7.d

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.6, Containment Systems</b>				
3.6 L1	Not used.			
3.6 L2	Not used.			
3.6 L3	CTS Actions have been modified to allow continued operation for the condition of an inoperable air lock door interlock mechanism. Actions parallel those for an inoperable air lock door except that containment entry and exit is controlled by a dedicated individual.	3.6.2 Action B	3.6.1.3 Actions	III
3.6 L4	The frequency for testing the air lock interlock was relaxed from at least once per 6 months to at least once per 24 months so that the interlock can be tested in a Mode when it is not required.	SR 3.6.2.2	4.6.1.3.c	VI
3.6 L5	The requirement to stagger the scheduling of purge valve leakage tests for the 48-inch supply and exhaust penetrations was deleted to reflect system design and testing procedures.	SR 3.6.3.7	4.6.1.7.3	VI
3.6 L6	Surveillances to verify that each automatic valve actuates to its correct position and that each pump starts on a test signal was changed to allow actual as well as simulated signals for actuation during operation as well as during shutdown. This allows credit for the surveillance if a valid actuation occurs during operation or through post-maintenance testing that satisfies the Surveillance Requirement.	SR 3.6.3.8, SR 3.6.6.5, SR 3.6.6.6, SR 3.6.6.7, SR 3.6.7.4,	4.6.2.1.c, 4.6.2.2.c, 4.6.2.3.b, 4.6.3.2	V

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L7	Not used.			
3.6 L8	The containment spray and containment cooling fans Specifications have been combined with separate restoration Actions for each system to be completed within 7 days. To prevent continued operation without meeting the LCO by alternating between the two Actions, separate 14 day completion times measured from entry into the LCO were included to restore all inoperable trains. This change could result in as much as 7 additional days to complete all restoration activities.	3.6.6 Actions A and C	3.6.2.1 Actions, 3.6.2.3 Actions	IV
3.6 L9	Action requirements were relaxed to allow entry into the applicable Modes with one hydrogen recombiner inoperable. Also, to prevent unnecessary unit shutdowns, Actions were included to address both hydrogen recombiners inoperable. The Actions are to periodically verify that hydrogen control is otherwise maintained and that one hydrogen recombiner is restored within 7 days.	3.6.8 Actions A and B	3.0.3 3.6.4.2 Actions,	III
3.6 L10	The list of acceptable isolation devices which may be used to isolate a penetration with an inoperable isolation valve was revised to include check valves with flow through the valve secured to accommodate those penetrations designed with check valves for isolation.	3.6.3 Action A	3.6.3 Action a.2 3.6.3 Action a.3	III

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.6 L11	The CTS exception that valves and blind flanges inside containment which are locked, sealed, or otherwise secured in their correct position to isolate a penetration need not be verified closed was similarly applied to isolation devices outside containment since administrative controls provide a positive means of controlling their correct positions.	SR 3.6.3.3, SR 3.6.3.4, SR 3.6.3.8, SR 3.6.6.5, SR 3.6.7.4	4.6.1.1.a, 4.6.2.1.c.1, 4.6.2.2.c, 4.6.3.2	V
3.6 L12	Power operated valves were removed as a type of valve for which isolation times must be verified. Isolation time implies receipt of an automatic isolation signal where power operated valves are remote manually operated.	SR 3.6.3.5	4.6.3.3	V
3.6 L13	CTS implicitly requires immediate unit shutdown when both valves in a penetration are inoperable. The completion time for isolating the affected penetration was relaxed to 1 hour by adding an action which addresses this condition, consistent with the time allowed for an inoperable containment.	3.6.3 Action B	3.6.3 Actions	IV
3.6 L14	Actions were included to address penetrations which are designed with only one containment isolation valve. The completion time for restoring/isolating the affected penetration was relaxed from 4 hours to 72 hours considering the design provisions associated with these closed systems.	3.6.3 Action C	3.6.3 Actions	IV

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific  
(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>	<b>Change Category</b>
3.6 L15	Notes were added to Actions and Surveillance Requirements requiring verification of containment isolation devices to allow the verification by use of administrative means when the devices are located in high radiation areas. This change reduces personnel exposure to radiation in areas with limited access.	3.6.2 Action A Note, 3.6.3 Actions A and C Note, SR 3.6.3.3 Note SR 3.6.3.4 Note	3.6.1.3 Action a.2 4.6.1.1.a	III, V
3.6 L16	Notes were included to allow use of administrative means to verify the affected penetration flow path is isolated in high radiation areas and for isolation devices that are locked, sealed, or otherwise secured.	3.6.3 Action A.2 & C.2 Notes	3.6.3 Actions	III

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.6, Containment Systems</b>					
3.6 LA1	Table 3.6-1	Design information, such as penetration number, valve number, function, and isolation time, for containment isolation valves.	Bases	ITS 5.5.14	1
3.6 LA2	3.6.1.3.a	Details on the Operability requirements for air lock doors to be closed except for containment entry and exit.	Bases	ITS 5.5.14	2
3.6 LA3	4.6.1.5	Details for determining containment average air temperature.	Bases	ITS 5.5.14	3
3.6 LA4	3.6.1.7.a, 4.6.1.7.1	Details for ensuring that the 48-inch purge valves cannot be inadvertently opened.	Bases	ITS 5.5.14	3
3.6 LA5	Not used.				
3.6 LA6	3.6.2.1	Design information related to Containment Spray Systems Operability.	Bases	ITS 5.5.14	1
3.6 LA7	4.6.2.1.b	Details of the discharge head and flow path for testing the containment spray pumps.	Bases	ITS 5.5.14	3
3.6 LA8	4.6.2.1.d	Details of how to perform verification of unobstructed containment spray nozzles.	Bases	ITS 5.5.14	3
3.6 LA9	3.6.2.2.b	Design information related to Spray Additive System Operability.	Bases	ITS 5.5.14	1
3.6 LA10	4.6.2.2.d	Details of how to perform verification of flow rate from spray additive tank.	TRM	§50.59	3
3.6 LA11	3.6.2.3	Design information related to containment cooling fans operability.	Bases	ITS 5.5.14	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.6 LA12	4.6.2.3.a.1	Details of how to perform verification that each containment fan system operates in slow speed.	Bases	ITS 5.5.14	3
		Details of how to perform verification that each containment fan system starts from the control room.	TRM	§50.59	3
3.6 LA13	3.6.4.2	Design details related to Hydrogen Recombiner Systems Operability.	Bases	ITS 5.5.14	1
3.6 LA14	4.6.4.2.a, 4.6.4.2.b.2, 4.6.4.2.b.3	Details of how to demonstrate each Hydrogen Recombiner System is Operable, specifically the rate of heater sheath temperature increase and power consumption, the attributes of the visual inspection, and the required heater phase resistance.	Bases	ITS 5.5.14	3
	4.6.4.2.b.1	Details of how to demonstrate each Hydrogen Recombiner System is Operable, specifically the Channel Calibration of instrumentation and controls.	TRM	§50.59	3
3.6 LA15	4.6.3.1	Details of how to perform post maintenance testing of containment isolation valves.	TRM	§50.59	3
3.6 LA16	4.6.1.7.3, 4.6.1.7.4	Acceptance criteria for leakage rate testing of containment purge valves.	TRM	§50.59	3
3.6 LA17	3.6.1.7 Action a	Details of how to isolate the 48 inch purge valves penetrations.	Bases	ITS 5.5.14	3
3.6 LA18	1.7	Details of containment penetration design which constitute Operability attributes.	Bases	ITS 5.5.14	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.6, Containment Systems</b>			
3.6 M1	Not used.		
3.6 M2	The Action to maintain at least one containment air lock door closed within 24 hours was restricted to require the door be verified closed within 1 hour.	3.6.2 Actions A.1 and C.2	3.6.1.3 Actions a.1 and b
3.6 M3	Containment entry and exit when both air locks have an inoperable door was limited from an indefinite period to 7 days under administrative controls.	3.6.2 Action A Note 2	3.6.1.3 Actions

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.7, Plant Systems</b>			
3.7 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431 (STS).	Section 3.7	3/4.7, 3/4.9.4, 3/4.9.11, 3/4.9.12, 5.6
3.7 A2	Explicit allowances for separate condition entry for each inoperable main steam safety valve (MSSV) and main steam isolation valve (MSIV) were included to clarify current practice for tracking allowable outage times for each inoperable component.	3.7.1 Actions, 3.7.2 Action C	3.7.1.1 Actions, 3.7.1.5 Actions (Modes 2 and 3)
3.7 A3	Not used.		
3.7 A4	Explicit exception to the provisions of Specifications 3.0.4 and 4.0.4 was replaced by a Note to the surveillance which provides the same allowance to enter the lowest Mode of applicability to perform the surveillance to verify Operability.	SR 3.7.1.1 Note	3.7.1.1 Action c, 4.7.1.1
3.7 A5	Not used.		
3.7 A6	Not used.		
3.7 A7	The Action to restore the condensate storage tank (CST) was deleted since the provision to restore inoperable components always applies and does not need to be explicitly stated.	3.7.6 Actions	3.7.1.3 Action a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 A8	Clarification was added that valves locked, sealed, or otherwise secured in their accident position under administrative control are exempt from actuation verification to reflect the intent of the CTS.	SR 3.7.5.4, SR 3.7.8.4	4.7.1.2.1.c.1, 4.7.4.c.1 (Bw), 4.7.4.b.1 (By)
3.7 A9	The conditional phrases requiring performance of only the Operability surveillance for the supply source for the auxiliary feedwater pumps was deleted since surveillances are not required to be performed on inoperable equipment and since an Action requires demonstration of the Operability of the backup supply.	SR 3.0.1, 3.7.6 Action A	4.7.1.3.1, 4.7.1.3.2
3.7 A10	The phrase "but open" was deleted from the condition when one MSIV is inoperable since the units are not licensed to operate with less than 4 loops. Also, when in Mode 1 with an inoperable MSIV, the Actions to shut down the unit to Mode 4 was changed to Mode 2 since Actions pertaining to Modes 2 and 3 place the unit in a nonapplicable Mode if Operability is not restored.	3.7.2 Actions	3.7.1.5 Actions
3.7 A11	Explicit exception to the provisions of CTS 3.0.4 and 4.0.4 was replaced by a Note which provides the same allowance to enter the lowest Mode of applicability to perform the surveillance to verify Operability.	SR 3.7.2.1 Note	3.7.1.5 Actions, 4.7.1.5
3.7 A12	The Actions associated with an inoperable Component Cooling Water (CC) system "safety loop" or "heat exchanger" were applied to an inoperable CC system "flowpath" since these components comprise a flowpath.	3.7.7 Action A	3.7.3 Actions a and c
3.7 A13	Surveillance notes stating that isolating flow to individual CC or Essential Service Water (SX) systems components does not render those systems inoperable were included to clarify system Operability requirements consistent with the intent of the CTS.	SR 3.7.7.1 Note, SR 3.7.8.1 Note	4.7.3.1, 4.7.4.a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 A14	Specifications requiring availability of flow from the opposite-unit's SX pump and the SX crosstie were combined into one Specification with the LCO requiring "An opposite-unit SX train for unit-specific support" to be Operable.	LCO 3.7.8.b, 3.7.8 Actions B and C, SR 3.7.8.2, SR 3.7.8.3	3/4.7.4.1, 3/4.7.4.2
3.7 A15	The use of "unit-specific" and "opposite-unit" was substituted for parenthetical unit designations to clarify requirements and applicability of sharing SX availability between units.	3.7.8	3.7.4.1, 3.7.4.2
3.7 A16	A Note was added to the surveillance to periodically operate the opposite unit's SX pump clarifying that its performance is only required when the opposite unit is shutdown. This Note is necessary to retain current requirements because of a more restrictive change to the Applicability.	SR 3.7.8.2 Note	4.7.4.1.b
3.7 A17	The exception to the provisions of CTS 4.0.4 was removed for the SX System crosstie demonstration surveillance. A note for the associated Action requirement and the application of LCO 3.0.4 makes this explicit exception unnecessary.	SR 3.7.8.3, 3.7.8 Required Action B.1 Note, LCO 3.0.4	4.0.4 4.7.4.2.b
3.7 A18	The Control Room Ventilation (VC) System Specification requirements were separated into two Specifications covering VC Filtration System and VC Temperature Control System.	3.7.10, 3.7.11	3/4.7.6
3.7 A19	The requirement to enter LCO 3.0.3 was explicitly stated as an Action for the condition of two VC Systems being inoperable to clarify current requirements.	3.7.10 Action E, 3.7.11 Action E	3.0.3 3.7.6 Actions

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 A20	Surveillances were included to perform required filter testing in accordance with the Ventilation Filter Testing Program (VFTP) where most of the filter testing requirements and acceptance criteria are now located.	SR 3.7.10.2, SR 3.7.12.2, SR 3.7.13.2	4.4.12, 4.7.6, 4.7.7
3.7 A21	The Nonaccessible Area Exhaust Filter Plenum Ventilation System Specification was revised to reference system "trains" rather than "plenums."	3.7.12	3/4.7.7
3.7 A22 (Bw)	Obsolete, cycle-specific surveillance requirements regarding the Emergency Makeup System's ability to maintain the required positive pressure relative to adjacent areas were deleted.	SR 3.7.10.4	4.7.6.e.3, 4.7.6.e.5
3.7 A23	The condition of the equipment hatch removed was reformatted with the Applicability from the Containment Building Penetrations Specification as the Applicability for the Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System Specification along with the applicable Actions and Surveillance Requirements.	3.7.13	3.9.4.a, 3.9.4 Applicability, 4.9.4.2
3.7 A24	The explicit surveillance requirement to verify that the FHB Ventilation System maintains the fuel handling building at the specified negative pressure prior to special condition entry was deleted as redundant to the requirements of STS SR 3.0.4.	SR 3.0.4	4.9.4.2.a
3.7 A25	The Action to suspend all operations involving fuel movement within the storage pool was revised to delete the phrase "until at least one FHB Exhaust Filter Plenum is restored to Operable status." Other Actions address the condition of one FHB System train inoperable and STS LCO 3.0.2 requires their entry upon restoration of the first train.	3.7.13 Action C, LCO 3.0.2	3.9.12 Action b
3.7 A26	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific



**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 A27	The phrase "unless already operating" was deleted from the surveillance to verify the FHB System automatically starts on an actuation signal since current procedures require a system start.	SR 3.7.13.4	4.9.12.d.2
3.7 A28	A Note was included to clarify the applicability and to differentiate this surveillance from a similar ITS SR performed without the equipment hatch intact.	SR 3.7.13.5	4.9.12.d.3
3.7 A29	The CTS intent for the surveillance frequency was clarified by replacing the phrase "following each Cold Shutdown of greater than 30 days" with "whenever the unit has been in Mode 5, Mode 6, or defueled for a cumulative period of > 30 days."	SR 3.7.5.6	4.7.1.2.2
3.7 A30 (Bw)	Obsolete, date-specific applicability statement was deleted.	LCO 3.7.12	3.7.7
3.7 A31 (Bw)	Obsolete, cycle-specific applicability statement was deleted.	SR 3.7.13.3	4.9.4.2
3.7 A32	The CTS intent for the surveillance requirements to run equipment for a specified time was clarified by specifying a minimum run time.	SR 3.7.8.2, SR 3.7.10.1.b	4.7.4.1.b, 4.7.6.b
3.7 A33	The CTS intent of the surveillance was clarified to require the SX System crosstie valves are verified "secured in the open position" rather than "locked open."	SR 3.7.8.3	4.7.4.2.a
3.7 A34 (By)	References to Ultimate Heat Sink (UHS) basin water levels were changed from "either" to "one or more" to clarify that the UHS is a common system with interconnected basins.	3.7.9 Action B	3.7.5 Action a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7 A35 (By)	The Action to restore inoperable SX components to Operable status was deleted since the option to restore inoperable components currently exists and does not need to be explicitly stated.	3.7.9 Action C, LCO 3.0.2	3.7.5 Actions c.1 and e.1.a
3.7 A36 (By)	Clarification was added that valves locked, sealed, or otherwise secured in the open position are exempt from verification of their correct position to reflect the intent of the CTS.	SR 3.7.9.5	4.7.5.e.3, 4.7.5.e.4
3.7 A37	Not used.		
3.7 A38	Not used.		
3.7 A39	Not used.		
3.7 A40	The surveillance to verify that SX cooling water is available to each CC heat exchanger was revised to clarify that "available" means the valves directly serving the heat exchangers are either in the correct position or capable of being aligned to the correct position.	SR 3.7.7.2	4.7.3.3.b
3.7 A41	Not used.		
3.7 A42	The Action to restore inoperable MSSVs to Operable status was deleted since the option to restore inoperable components currently exists and does not need to be explicitly stated.	3.7.1 Action A, LCO 3.0.2	3.7.1.1 Action a
3.7 A43	Reference to "automatic" valves in the CC System surveillance was deleted since the system design does not contain any valves of this type.	SR 3.7.7.1	4.7.3.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7 A44	The CTS Nonaccessible Area Exhaust Filter Plenum Ventilation System Specification was revised to reflect the changes as approved in Amendment 105/97.	LCO 3.7.12	3.7.7 and 3.7.7 Actions
3.7 A45	The LCO requirement to maintain two trains of Nonaccessible Area Exhaust Filter Plenum Ventilation System aligned for operation and one train aligned in standby was clarified, consistent with CTS intent, by a note excepting periods of realignment.	LCO 3.7.12 Note	3.7.7
3.7 A46 (By)	"≤" was used to characterize the maximum flow for testing Nonaccessible Area Exhaust Filter Plenum Ventilation System trains.	SR 3.7.12.4	4.7.7.d.3
3.7 A47	Not used.		
3.7 A48	Not used.		
3.7 A49	The surveillance to determine the water level in the spent fuel storage pool was revised to specify the water level to be at least 23 feet above the top of the irradiated fuel assemblies seated in the storage racks, consistent with the LCO limit.	SR 3.7.14.1	4.9.11
3.7 A50	Not used.		
3.7 A51	The CTS Water Level/Boron Concentration - Storage Pool Specification requirements were separated into two Specifications addressing Spent Fuel Pool Water Level and Spent Fuel Pool Boron Concentration requirements.	3.7.14, 3.7.15	3/4.9.11

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7 A52	The requirement to maintain a specified concentration of dissolved boron whenever fuel assemblies "are in the storage pool" was clarified to whenever fuel assemblies "are stored in the spent fuel pool."	3.7.15 Applicability	3.9.11 Applicability
3.7 A53	Actions were modified by 1) a Note indicating that the RCS Loops - Mode 4 Specification be entered if an inoperable CC train results in an inoperable Residual Heat Removal (RHR) loop and 2) Notes indicating that the AC Sources Specification or RCS Loops - Mode 4 Specification, as applicable, be entered if an inoperable unit-specific SX train results in an inoperable emergency diesel generator or RHR loop. These changes ensure the more restrictive Actions are taken for these supported system components and is consistent with the requirements of the CTS.	3.7.7 Actions Note, 3.7.8 Action A Notes	3.7.3 Actions, 3.7.4 Actions
3.7 A54 (By)	The restoration and verification Actions associated with an inoperable SX makeup pump were reformatted and combined with the restoration and verification Actions associated with an inoperable UHS cooling tower basin level switch since the level switch is necessary to the Operability of the SX makeup pump.	3.7.9 Action C	3.7.5 Actions c.2 and e
3.7 A55 (By)	Actions to verify UHS deep well makeup pumps Operability and cooling tower basin levels $\geq 90\%$ when 1) the Rock River water level is forecasted to exceed 702.0 feet MSL, 2) the Rock River water level is $\leq 664.7$ or flow is $\leq 700$ cfs, and 3) a tornado watch is issued for the Byron site area were combined and reformatted.	3.7.9 Required Actions F.2 and F.3	3.7.5 Actions f, g.2, and h
3.7 A56 (By)	The fuel supply limit for the diesel driven SX makeup pump was revised from 36% of tank volume to 47% indicated level to ensure the minimum required volume is available when considering instrument inaccuracies.	SR 3.7.9.7	4.7.5.e.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 A57	The Actions required for FHB Ventilation System inoperabilities to place the remaining Operable train in operation if it can be powered by an Operable emergency power source, and suspension movement of irradiated fuel were reformatted consistent with the Applicability and current requirements.	3.7.13 Actions B and C	3.9.4 Actions
3.7 A58	Obsolete, cycle-specific requirements regarding the minimum condensate storage tank (CST) level were deleted.	LCO 3.7.6	3.7.1.3
3.7 A59 (By)	The Actions have been clarified to identify that the allowance for an inoperable SX makeup pump includes the defueled condition.	3.7.9 Action C	3.7.5 Action c.2

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.7, Plant Systems</b>				
3.7 L1	The Actions which permit continued operation with up to three Main Steam Safety Valves (MSSVs) inoperable were relaxed from either restoring the inoperable valves to Operable status or reducing the Power Range Neutron Flux High Trip Setpoints to reducing Thermal Power in accordance with the number of MSSVs inoperable but without the requirement to reduce the trip setpoints.	3.7.1 Action A	3.7.1.1 Action a	III
3.7 L2	The Actions associated with both auxiliary feedwater (AF) pumps inoperable were relaxed from requiring unit shutdown to immediately initiating action to restore one AF train to Operable status to avoid subjecting the unit to the transient of a shutdown when in this degraded condition.	3.7.5 Action C	3.7.1.2 Action b	III
3.7 L3	The requirement to verify that the automatic portions of the AF System function on an actuation signal was changed to allow actual as well as simulated signals for actuation during operation as well as during shutdown. This allows credit for the surveillance if a valid actuation occurs during operation or through post-maintenance testing that satisfies the surveillance.	SR 3.7.5.4, SR 3.7.5.5	4.7.1.2.1.c	V
3.7 L4	The requirement to perform a gross radioactivity analysis of secondary coolant was deleted since the calculated doses to the public are dominated by iodine isotopes rather than noble gases and activated corrosion products. The surveillance for Dose Equivalent I-131 ensures the predominant dose contributors are monitored.	3.7.3	Table 4.7-1, Item 1	V

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L5 (By)	The requirement to verify that each diesel-driven Essential Service Water (SX) System makeup pump starts and operates on a low basin water level test signal was changed to allow the use of an actual as well as a simulated actuation signal since Operability can be adequately demonstrated with either signal.	SR 3.7.9.6	4.7.5.e.2	V
3.7 L6	The completion times for the actions associated with an inoperable Main Steam Isolation Valve ( MSIV) were relaxed from 4 hours to 8 hours for restoring the valve to Operable in Mode 1 and for closing the inoperable valve in Mode 2 or 3.	3.7.2 Actions A and C	3.7.1.5 Actions	IV
3.7 L7	An Action was included to allow continued operation in Mode 2 or 3 with two or more MSIVs inoperable if the valve is closed within 8 hours since a closed MSIV is performing its safety function.	3.7.2 Action C	3.7.1.5 Actions (Modes 2 and 3)	III
3.7 L8	Surveillances to verify that each automatic valve actuates to its correct position and that each pump starts on a Safety Injection (SI) test signal was changed to allow actual as well as simulated signals for actuation during operation as well as during shutdown. This allows credit for the surveillance if a valid actuation occurs during operation or if post-maintenance testing satisfies the surveillance.	SR 3.7.7, SR 3.7.8.4, SR 3.7.8.5	4.7.3.2.b, 4.7.4.b (By), 4.7.4.c (Bw)	V
3.7 L9 open RAI 3.7.8-11	An exception was included to relax the requirement that the opposite-unit SX pump must be available prior to entering or changing Modes of applicability. This revision allows Mode changes if the opposite-unit train is inoperable provided that the train is restored to Operable status within 7 days.	3.7.8 Action B Note	3.0.4, 3.7.4.1 Actions	II, III

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L10	The time allowed for restoration of an inoperable Control Room Ventilation (VC) Temperature Control System in Modes 5 and 6 was relaxed from 7 days to 30 days to coincide with that allowed for restoration in Modes 1, 2, 3, and 4.	3.7.11 Action A	3.7.6 Action a (Modes 5 and 6)	IV
3.7 L11	The requirement to verify that the VC Filtration System actuates on a test signal was changed to allow the use of an actual as well as a simulated actuation signal since Operability can be adequately demonstrated with either signal.	SR 3.7.10.3	4.7.6.e.2	V
3.7 L12	The frequency for verifying the capability of each of the two VC Filtration System trains to maintain the stated positive pressures in the control room and the upper cable spreading room was relaxed from testing each train every 18 months to testing one train every 18 months on a Staggered Test Basis.	SR 3.7.10.4	4.7.6.e.3, 4.7.6.e.5	VI
3.7 L13	The frequency for verifying the operation of each of the three Nonaccessible Area Exhaust Filter Plenum Ventilation System trains was relaxed from testing one train every 10 1/3 days to testing each train every 31 days.	SR 3.7.12.1	4.7.7.a	VI
3.7 L14	The requirement to verify that the Nonaccessible Area Exhaust Filter Plenum Ventilation System actuates on a manual signal was changed to allow the use of an actual as well as a simulated actuation signal since Operability can be adequately demonstrated with either signal.	SR 3.7.12.3	4.7.7.d.2	V

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L15	When the condensate storage tank (CST) is inoperable and the SX System serves as the backup supply for the AF System, CTS requires demonstration of the SX System Operability within 4 hours and every 12 hours by performing a valve lineup surveillance otherwise performed every 31 days. The method for this demonstration was revised to allow the use of administrative means to verify that no valve manipulations since the last valve lineup occurred that would affect SX System Operability.	3.7.6 Action A	3.7.1.3 Action b, 4.7.1.3.2, 4.7.4.a	III, V
3.7 L16	The required Actions for the containment equipment hatch and the Fuel Handling Building (FHB) Ventilation System were combined, reformatted, and revised to allow 7 days to restore an inoperable FHB Ventilation System train.	3.7.13 Actions	3.9.4 Actions	III, IV
3.7 L17	The frequency for verifying the capability of the FHB Ventilation System to maintain the specified negative pressure was relaxed from testing each train every 18 months to testing one train every 18 months on a Staggered Test Basis. When the containment hatch is removed, the frequency for this surveillance was relaxed from testing each train every 7 days to testing one train every 7 days on a Staggered Test Basis.	SR 3.7.13.3, SR 3.7.13.5	4.9.4.2.b, 4.9.12.d.3	VI
3.7 L18	The applicability for the FHB Ventilation System requirements was changed from when irradiated fuel is in the spent fuel pool to during movement of irradiated fuel assemblies in the FHB to be consistent with the design basis fuel handling accident.	3.7.13 Applicability	3.9.12 Applicability	II

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L19	The requirement to verify that the FHB Ventilation System actuates on an SI or High Radiation test signal was changed to allow the use of an actual as well as a simulated actuation signal since Operability can be adequately demonstrated with either signal.	SR 3.7.13.4	4.9.12.d.2	V
3.7 L20	The frequencies for verifying the operation of each of the two VC Filtration System and the two FHB Ventilation System trains were relaxed from testing one train every 15 ½ days to testing each train every 31 days.	SR 3.7.10.1, SR 3.7.13.1	4.7.6.b, 4.9.12.a	VI
3.7 L21	An action associated with one FHB Ventilation System train inoperable was included to allow 7 days to restore the train to Operable before taking the currently required Action to place the remaining Operable train in emergency mode.	3.7.13 Action A	3.9.12 Action	III
3.7 L22 (By)	The allowance to extend the allowed outage time for restoration of an inoperable SX makeup pump to 14 days if at least one unit is in Mode 5 or 6 was revised to eliminate the restriction that the restoration time extension be used only for inspection and extended maintenance	3.7.9 Action C	3.7.5 Action c.2	III
3.7 L23 (By)	Not used.			
3.7 L24 (By) open	The required Actions associated with two inoperable ultimate heat sink (UHS) cooling tower basin level switches were reformatted into appropriate Actions for two SX makeup pumps inoperable. An allowance to restore UHS makeup capability within 1 hour was included provided the specified compensatory Actions are taken rather than shutdown the unit per LCO 3.0.3.	3.7.9 Actions D and G	3.7.5 Action e.2	III, IV

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L25	Not used.			
3.7 L26	Not used.			
3.7 L27 (Bw)	The requirement to verify flow distribution through each bank of Nonaccessible Area Exhaust Filter Plenum Ventilation System trains when verifying the ability of the system to maintain the specified negative pressure in the Emergency Core Cooling System (ECCS) pump rooms was deleted since flow distribution between banks is a fixed parameter.	SR 3.7.12.4	4.7.7.d.3	V
3.7 L28	The frequency for verifying the developed head for each AF pump was relaxed, as a result of conducting the surveillance in accordance with the Inservice Testing Program, from testing one pump every 46 days to testing each train every 92 days.	SR 3.7.5.3	4.7.1.2.1.b.1	VI
3.7 L29	The acceptance criteria for verifying the Nonaccessible Area Exhaust Filter Plenum Ventilation System can maintain the stated negative pressure in the ECCS pump rooms was restricted to a maximum flow rate rather than a range.	SR 3.7.12.4	4.7.7.d.3	V
3.7 L30	The explicit Action to restore the spent fuel pool water level to within limits within 4 hours was eliminated since the remaining Action to immediately suspend movement of fuel assemblies precludes the initiation of a design basis fuel handling accident and the option to restore water level in order to exit the LCO is implied.	3.7.14 Action A.1	3.9.11 Action a	III, IV

**Less Restrictive Change Categories**

- I Relaxation of LCOs and Administrative Controls
- II Relaxation of Applicability
- III Relaxation of action requirements
- IV Relaxation of Completion Time

- V Relaxation of SR acceptance criteria
- VI Relaxation of Surveillance Frequency
- VII Deletion of requirements redundant to regulation
- VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.7 L31	The Applicability for maintaining the specified water level in the spent fuel pool was relaxed from when irradiated fuel assemblies are present to during movement of irradiated fuel assemblies in the pool since this represents the only condition during which the design basis fuel handling accident can be initiated.	3.7.14 Applicability	3.9.11 Applicability	II
3.7 L32	Not used.			
3.7 L33 (By)	An exception to the provisions of Specification 3.0.4 was included to relax the requirement that both UHS deep well makeup pumps must be Operable prior to entering or changing Modes of applicability. This change allows Mode changes provided that the basin level for each cooling tower is verified $\geq 90\%$ and each pump's Operability is verified within specified completion times.	3.7.9 Action F Note	3.7.5 Actions f.2, g.2.b, and h.2	III
3.7 L34 (By)	CTS requires that if a UHS deep well makeup pump is inoperable when the Rock River water level is forecasted to exceed 702.0 feet MSL, the pump must be restored to Operable status within 72 hours or before the river level exceeds the specified level. The ITS completion time for restoring the inoperable pump was revised to 72 hours, regardless of the river level, since the Operable pump is unaffected by the river level.	3.7.9 Required Action F.3	3.7.5 Action f.2	III, IV
3.7 L35 (By)	The explicit requirement to place the unit in Mode 5 in which the LCO is not applicable when the Actions associated with an inoperable UHS deep well makeup pump are not met while the Rock River water level is $\leq 664.7$ feet MSL or flow is $> 700$ cfs was revised to delete the intermediate step to place the unit in Mode 4 within 12 hours such the total time to have the unit in Mode 5 remains the same.	3.7.9 Action G	3.7.5 Action g.2.c	III, IV

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>	<b>Change Category</b>
3.7 L36 (By)	For consistency with the restoration time allowed for an inoperable UHS deep well makeup pump when the Rock River is outside its minimum water level or flow limits, the restoration time was relaxed from 30 minutes to 72 hours whenever the Byron site area is under a tornado watch.	3.7.9 Required Action F.3	3.7.5 Action h.2	IV
3.7 L37	The Modes and conditions when the MSIVs are required to be Operable was relaxed to except when all MSIVs are closed in Modes 2 and 3 to indicate that the LCO does not apply when the valves are performing their isolation function.	3.7.2 Applicability	3.7.1.5 Applicability	II

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.7, Plant Systems</b>					
3.7 LA1	Table 3.7-2	Details for setting the lift pressure of the Main Steam Safety Valves (MSSVs).	Bases	ITS 5.5.14	3
3.7 LA2	3.7.1.2	Design attributes of an Operable Auxiliary Feedwater (AF) System.	Bases	ITS 5.5.14	1
3.7 LA3	4.7.1.2.1.b.1	Flow and developed head details for testing the AF pumps.	TRM	§50.59	3
3.7 LA4	4.7.1.2.3.b, 4.7.1.2.3.c	Details for sampling and analyzing the AF pump diesel fuel and inspection requirement for the engine.	TRM 5.5.13 Program	§50.59 §50.59	3
3.7 LA5	3.7.1.3 Action b, 4.7.1.3.2	Specific reference to and surveillance requirements for the Essential Service Water (SX) System as a backup supply to the AF pumps.	Bases	ITS 5.5.14	2, 3
3.7 LA6	3.7.3	Design details defining Component Cooling Water (CC) System Operability.	Bases	ITS 5.5.14	1
3.7 LA7	4.7.3.2.a	Surveillance criteria for periodically operating the CC pumps.	TRM	§50.59	3
3.7 LA8	4.7.3.2.b	Details of how to test the CC common pump while powered from each Engineered Safety Feature (ESF) electrical bus.	Bases	ITS 5.5.14	3
3.7 LA9	4.7.3.3.a	Surveillance requirement to verify CC heat exchanger inlet and outlet valves are Operable.	TRM	§50.59	3
3.7 LA10	Not used.				

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.7 LA11	3.7.4	Design attributes regarding the electrical independence of the SX System trains.	Bases	ITS 5.5.14	1
3.7 LA12	3.7.4.1, 3.7.4.1 Actions, 3.7.4.2, 3.7.4.2 Action a, 4.7.4.2.a	Details regarding the availability (capability) of an SX pump and system crosstie valves for support of opposite-unit operation.	Bases	ITS 5.5.14	1, 2
3.7 LA13	4.7.4.1.a	Surveillance to verify the opposite-unit SX train is capable of being operated from the Main Control Room.	TRM	\$50.59	3
3.7 LA14(Bw)	4.7.5.2	Surveillance to perform a hydrographic survey of the essential service cooling pond.	TRM	\$50.59	3
3.7 LA15(Bw)	3.7.5	Operability details regarding essential service cooling pond temperature and capacity limits.	Bases	ITS 5.5.14	3
3.7 LA16	3.7.7, 4.7.7	Design attributes regarding the electrical independence and the capacity of the Nonaccessible Area Exhaust Filter Plenum Ventilation System trains.	Bases	ITS 5.5.14	1
	4.7.7.a	Details associated with the method of demonstrating the Operability of the Nonaccessible Area Exhaust Filter Plenum Ventilation System trains.	TRM	\$50.59	3
3.7 LA17	3.7.6, 4.7.6.b, 4.7.6.e.2	Design attributes regarding the electrical independence of the Control Room Ventilation (VC) Filtration System and VC Temperature Control System trains and details of the methods for demonstrating the Operability of the VC Filtration System.	Bases	ITS 5.5.14	1, 3

**Relocated Detail Types**

- |   |                                 |   |  |
|---|---------------------------------|---|--|
| 1 | Details of System Design        | 3 | Procedural Details for Meeting TS Requirements |
| 2 | Description of System Operation |   |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.7 LA18	3.7.6 Actions (Modes 1, 2, 3, and 4)	Potential reasons for which the VC System Operability requirements would not be met.	Bases	ITS 5.5.14	1
3.7 LA19	4.7.6.e.3, 4.7.6.e.5	Acceptance criteria for the recirculation flow rate when testing the VC Filtration System's ability to maintain a specified pressure.	TRM	§50.59	3
3.7 LA20	Figures 5.6-1, 5.6-2, and 5.6-3	Use of linear interpolation in determining minimum acceptable fuel assembly burnup for storage requirements.	Bases	ITS 5.5.14	3
3.7 LA21	3.9.12, 3.9.12 Applicability and Actions	Actions related to crane operation with loads over the spent fuel pool whenever irradiated fuel is in the pool.	TRM	§50.59	2
3.7 LA22	4.9.4.2	Details regarding alignment of other systems during performance of the surveillance for the Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System.	TRM	§50.59	3
3.7 LA23	3.9.12 , 3.9.12 Action a, 4.9.12.a, 4.9.12d.2	Design attributes regarding the electrical independence and the flowpath of the FHB Ventilation System trains.	Bases	ITS 5.5.14	1
	4.9.12.a	Details associated with the method of demonstrating the Operability of the FHB Ventilation System trains.	TRM	§50.59	3

Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific



**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.7 LA24 (By)	4.7.5.e.4, 4.7.5.i	Surveillances for verifying flow and flowpath of deep well pumps as a makeup source to the Ultimate Heat Sink (UHS).	TRM	§50.59	3
3.7 LA25 (By)	4.7.5.h	Surveillance for subjecting the diesel-driven SX makeup pump engines to an inspection in accordance with the manufacturer's recommendations.	TRM	§50.59	3
3.7 LA26 (By)	4.7.5.g	Surveillance for performing a Channel Calibration of the UHS cooling tower basin level switches.	TRM	§50.59	3
3.7 LA27 (By)	4.7.5.j	Surveillance for inspecting the UHS cooling tower fill material for abnormal breakage or degradation.	TRM	§50.59	3
3.7 LA28 (By)	4.7.5.d	Details associated with the method of demonstrating the Operability of the UHS cooling tower fans by starting them from the control room.	Bases	ITS 5.5.14	3
3.7 LA29 (By)	3.7.5.b, 3.7.5.c	Design attributes of an Operable UHS.	Bases	ITS 5.5.14	1
3.7 LA30 (By)	3.7.5.e, 3.7.5 Actions e.1 and e.2	UHS cooling tower basin level switches as an Operability condition and associated restoration Actions.	Bases	ITS 5.5.14	1, 2
3.7 LA31	Not used.				
3.7 LA32 (By)	3.7.5 Action e.3	Special Report to the Commission when any UHS cooling tower basin level switch is inoperable for more than 30 days.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.7 LA33	Not used.				
3.7 LA34	Not used.				
3.7 LA35	Not used.				
3.7 LA36	Not used.				
3.7 LA37	Not used.				
3.7 LA38	3.7.7 Actions	Information explaining that alignment of the Nonaccessible Area Exhaust Filter Plenum Ventilation System train for operation or in standby does not affect the Operability of the train.	Bases	ITS 5.5.14	2
3.7 LA39	Not used.				
3.7 LA40	3.9.11 Actions a and b	Requirement to suspend crane operation with loads in the spent fuel pool area when the water level or boron concentration is below their limits.	TRM	§50.59	2
3.7 LA41 (By)	4.7.5.f	Details for sampling and analyzing the diesel driven SX makeup pump fuel oil is within limits.	5.5.13 Program	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.7, Plant Systems</b>			
3.7 M1	The frequency for sampling and analyzing secondary coolant was revised from once per 31 days or once per 6 months, depending on the radioiodine concentration, to once per 31 days, regardless of other conditions.	SR 3.7.3.1	Table 4.7-1 Item 2
3.7 M2	An Action was added, when a Main Steam Isolation Valve (MSIV) is inoperable on Modes 2 and 3, to verify once per 7 days that the valve is closed.	3.7.2 Action C	3.7.1.5 Actions for Modes 2 and 3
3.7 M3	A surveillance was added to verify that each MSIV actuates to the isolation position on an actual or simulated actuation signal every 18 months.	SR 3.7.2.2	N/A
3.7 M4	Not used.		
3.7 M5	Not used.		
3.7 M6	The Applicability was changed to Modes 1, 2, 3, and 4 regardless of the status of the opposite-unit rather than only when the opposite-unit is shut down. Also, because of the time allowed to shut down the opposite-unit to Mode 5, the total time for restoration of an opposite-unit train to Operable was reduced from 37 hours plus 7 days to 7 days.	3.7.8 Applicability and Action B	3.7.4.1 Applicability and Actions
3.7 M7	The Applicability was revised to include "during movement of irradiated fuel assemblies" to reflect the potential for control room doses that may occur from a fuel handling accident in a defueled condition.	3.7.10 Applicability, 3.7.11 Applicability	3.7.6 Applicability
3.7 M8	The CTS surveillance to verify the Nonaccessible Area Exhaust Filter Plenum Ventilation System capable of maintaining the Emergency Core Cooling System (ECCS) equipment rooms at the stated negative pressure does not specify which or how many of the three 50% trains must be tested. Revisions require two trains be tested in staggered combinations.	SR 3.7.12.4	4.7.7.d.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.7 M9	The Surveillance Requirement to verify the capability of the fuel handling building (FHB) Ventilation System to maintain a negative pressure $\geq$ 0.25 inch water gauge with the equipment hatch "removed" was modified with a Note requiring this surveillance during movement of irradiated fuel assemblies or Core Alterations with the equipment hatch "not intact" to address when the hatch is not removed but when both doors of the integral air lock are open between the FHB and containment.	SR 3.7.13.3 Note	4.9.4.2
3.7 M10	Not used.		
3.7 M11	A new Specification was included to address the requirements of the steam generator power operated relief valves (PORVs). In formatting the Specification, the Applicability, Actions, and Surveillance Requirements applied to the LCO constitute restrictions which currently do not exist.	3.7.4	N/A
3.7 M12	The acceptance criteria for verifying the FHB Ventilation System can maintain the specified negative pressure in the fuel handling building was restricted to a flow rate of 23,100 cfm to identify abnormal inleakage.	SR 3.7.13.5	4.9.12.d.3
3.7 M13	Design features for storing new and spent fuel assemblies were reworded as a new Specification. In formatting the Specification, the Applicability, Actions, and Surveillance Requirements applied to the LCO constitute restrictions which currently do not exist.	3.7.16	5.6.1.1.e, 5.6.1.1.g, 5.6.1.1.h
3.7 M14	The Applicability for maintaining the specified boron concentration in the spent fuel pool was revised to apply to whenever any fuel assemblies are stored in the pool rather than only irradiated fuel assemblies.	3.7.15 Applicability	3.9.11 Applicability
3.7 M15 (By)	The time prescribed to initially verify both ultimate heat sink (UHS) cooling tower basin levels are $\geq$ 90% upon discovery of an inoperable basin level switch was reduced from 73 hours to 72 hours.	3.7.9 Required Action C.1	3.7.5 Action e.1.a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.7 M16 (By)	CTS allows continued operation with one UHS cooling tower basin level switch inoperable as long as basin levels are verified $\geq 90\%$ . ITS limits the time the plant may operate with this inoperability to either 7 or 14 days, depending on the operating status of both units.	3.7.9 Required Action C.3	3.7.5 Action e
3.7 M17 (By)	The allowance for entering the Modes of applicability (1, 2, 3, and 4) with both UHS cooling tower basin level switches inoperable was eliminated.	3.7.9 Action D	3.7.5 Action e.2.a, 3.0.4
3.7 M18 (By)	The fuel supply limit for the diesel driven SX makeup pump was revised from 36% of tank volume to 47% indicated level to compensate for increased fuel consumption resulting from a larger diameter pump impeller.	SR 3.7.9.7	4.7.5.e.1
3.7 M19 (By)	The Action to initiate restoration of an inoperable deep well pump within 30 minutes whenever the Byron site area is under a tornado watch was revised to impose a completion time for restoring both pumps to Operable status within 72 hours.	3.7.9 Required Action F.3	3.7.5 Action h.2
3.7 M20(Bw)	The minimum level of 57% for the condensate storage tank (CST) currently approved by License Amendment is contingent upon completion of a modification of the AF suction pressure instrumentation. Since the modification will not be installed prior to implementation of the ITS, the minimum CST level of 66% is applicable.	3.7.6	LCO 3.7.1.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.8, Electrical Power Systems</b>			
3.8 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431 (STS).	3.8	3/4.8
3.8 A2	The requirement to enter the default actions of LCO 3.0.3 to exit the Modes of applicability was explicitly stated as an Action for the condition of three or more AC electrical power sources being inoperable to clarify current requirements.	3.8.1 Action G	3.8.1.1 Actions, 3.0.3
3.8 A3	The restriction for performing various surveillances "during shutdown" was modified to include the operational Modes, consistent with current intent and practice, during which the surveillances may not be performed.	SR 3.8.1.9 Note, SR 3.8.1.10 Note 2, SR 3.8.1.11 Note, SR 3.8.1.14 Note 2, SR 3.8.1.16 Note, SR 3.8.1.17 Note, SR 3.8.1.18 Note, SR 3.8.1.19 Note, SR 3.8.4.7 Note 2, SR 3.8.4.8 Note	4.8.1.1.2.f, 4.8.2.1.2.d, 4.8.2.1.2.e, 4.8.2.1.2.f
3.8 A4	The Surveillance Requirement to visually inspect the batteries for physical damage or abnormal degradation was clarified by adding the phrase "that could degrade battery performance."	SR 3.8.4.3	4.8.2.1.2.c.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.8 A5	The stated minimum DG frequency response criteria was eliminated for the single largest post-accident load rejection surveillance because this test induces an over-frequency transient.	SR 3.8.1.9	4.8.1.1.2.f.2
3.8 A6	Reference to the DG 24-hour run surveillance as a prerequisite to the 5-minute restart surveillance was deleted because the option to run the DG for $\geq 2$ hours or until operating temperatures stabilize encompasses this prerequisite.	SR 3.8.1.15 Note 1	4.8.1.1.2.f.7
3.8 A7	The listing of some of the causes that could be ruled out as potential common mode failures was eliminated and replaced by an Action to demonstrate the absence of any potential common mode failures.	3.8.1 Action B	3.8.1.1 Actions a and b
3.8 A8	The current requirements were reformatted as an LCO note which allows: with one unit in shutdown mode and the opposite unit operating but with an inoperable DC bus due to an inoperable charger- the shutdown unit may supply the opposite unit's DC bus without load restriction.	LCO 3.8.5 Note	3.8.2.2 Action a
3.8 A9	Notes were included to clarify the appropriate Actions to be taken when one required division is de-energized. These actions may be required for the supported systems (distribution systems). This is consistent with the intent of CTS.	3.8.1 Action D Note, 3.8.2 Action A Note, 3.8.7 Action A Note	3.8.1.1 Action b, 3.8.1.2 Actions, 3.8.3.1 Action b
3.8 A10	The current Actions stipulated for less than the required AC electrical power sources Operable were separated to clarify requirements for the required offsite power source inoperable and the required DG inoperable.	3.8.2 Actions A and B	3.8.1.2 Actions

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.8 A11	Current DG fuel oil SRs were provided in a separate Specification and the Diesel Fuel Oil Testing Program.	3.8.3	4.8.1.1.2.a.2, 4.8.1.1.2.c, 4.8.1.1.2.d, 4.8.1.1.2.e
3.8 A12 (By)	References to battery type were deleted for Byron Station. Byron has only one type of battery.	3.8.4, 3.8.5, 3.8.6 SR 3.8.4.1	3.8.2.1 Action c.1, 4.8.2.1.2.a.2, Table 4.8-2 Note 4, 3.8.2.2 Action b.1
3.8 A13	Not used.		
3.8 A14	The allowance for one unit to supply power, via the crosstie breakers, to the opposite unit's inoperable DC bus having an inoperable charger was reformatted as an TS Action- to open one of the breakers within 60 hours. This 60 hours Completion Time corresponds to the time required for the opposite unit to reach Mode 5 if unable to restore the inoperable charger.	3.8.4 Action B	3.8.2.1 Action b
3.8 A15	An explicit Action was incorporated which requires immediate shutdown actions be commenced when two inoperable subsystems result in a loss of safety function. Along with the Safety Function Determination Program, this ensures that no loss of function will occur without the appropriate Actions.	3.8.9 Actions, LCO 3.0.6	3.8.3.1 Actions, 3.0.3

(By) - Byron specific  
(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.8, Electrical Power Systems</b>				
3.8 L1	The Completion Time for restoring multiple concurrent AC electric source to Operable was revised from "72 hours from initial loss" to allow 72 hours for the initial restoration and a separate overlapping 72 hours for restoring a subsequent inoperability, with a limit of 6 days total.	3.8.1 Actions A and B	3.8.1.1 Actions b, d, and e	IV
3.8 L2	The requirement to verify the other unit's A diesel generator (DG) is Operable when a unit-specific DG is inoperable" was deleted because this backup source of power is not credited in any design basis event.	3.8.1 Action B	3.8.1.1 Action c.2	III
3.8 L3	With a DG inoperable, CTS requires that unless all required features that depend on the remaining Operable DG are also Operable, a unit shut down be commenced within 2 hours. This Action was relaxed to require that the feature(s) supported by the inoperable DG be declared inoperable if its redundant counterpart is inoperable such that the appropriate Actions for two divisions of a feature inoperable may be less restrictive than an shut down within 2 hours. This change also allows 4 hours rather than 2 hours to commence the Actions dictated by the inoperable feature(s) in order to provide additional time for restoration.	3.8.1 Action B	3.8.1.1 Action c	III
3.8 L4	The completion time for demonstrating the remaining DG Operable was relaxed from 8 hours to 24 hours in order to provide additional time to restore the inoperable DG to prevent a unit shutdown.	3.8.1 Action B	3.8.1.1 Action b	IV

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L5	The frequency for performing the monthly DG surveillances was relaxed from testing one DG every 15 days to testing each DG every 31 days. Also, the staggered test basis for the 60 minute load test was deleted and replaced by the restriction that only one DG be tested at a time.	SR 3.8.1.2, SR 3.8.1.3, SR 3.8.1.4, SR 3.8.1.6, SR 3.8.3.1	4.8.1.1.2.a	VI
3.8 L6	Battery cell surveillance requirements were relaxed such that: 1) the specific gravity need not be corrected for electrolyte level during float charge of < 2 amps, 2) electrolyte level may temporarily exceed the maximum level mark during equalizing charge, and 3) any of the specific gravity limits may be satisfied if a cell's float charging current is < 2 amps.	Table 3.8.6-1	Table 4.8-2 Footnote 4	V
3.8 L7	The requirement for removing any accumulated water from the DG fuel oil day tanks after each 1 hour run was deleted because it is unlikely that water would be transferred from the storage tank during this operation.	SR 3.8.1.5	4.8.1.1.2.b	VI
3.8 L8	For the DG single largest post-accident load rejection test, the acceptable voltage band was applied to steady state conditions after the transient rather than during the transient because the transient voltage response is a secondary concern.	SR 3.8.1.9	4.8.1.1.2.f.2	V
3.8 L9	The requirement to verify various DG functions on a loss of offsite power or Emergency Safety Feature (ESF) actuation test signal was changed to allow the use of an actual as well as a simulated actuation signal because Operability can be adequately demonstrated with either signal.	SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.19, SR 3.8.1.13, SR 3.8.1.17	4.8.1.1.2.f.4, 4.8.1.1.2.f.5, 4.8.1.1.2.f.6, 4.8.1.1.2.f.6.c, 4.8.1.1.2.f.10	V

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L10	Surveillance to verify the capability to transfer fuel from the storage tank to the day tank of each DG was deleted because this function is not necessary to ensure the Operability of the DGs.	N/A	4.8.1.1.2.f.11	VIII
3.8 L11	Various DG Surveillance Requirements were relaxed by the addition of notes which allow that momentary transients outside the specified load ranges do not constitute a failure of the surveillance because these transients do not reflect an inability of the DGs to fulfill their safety-related functions.	SR 3.8.1.3 Note 2, SR 3.8.1.14 Note 1, SR 3.8.1.15 Note 2	4.8.1.1.2.a.5, 4.8.1.1.2.f.7	V
3.8 L12	The requirement for the 10-year simultaneous start of both DGs to be performed during shutdown was deleted because this restriction is unnecessary to assure continued safe operation of the facility.	SR 3.8.1.20	4.8.1.1.2.g	V
3.8 L13	The requirement to verify the DG(s), upon starting, accelerate to a minimum acceptable speed within 10 seconds was reduced from 600 rpm (equivalent to a generator frequency of 60 Hz) to 58.8 Hz, at which point the permissive is met to close the output breaker and accept loads.	SR 3.8.1.7, SR 3.8.1.15, SR 3.8.1.20	4.8.1.1.2.a.4, 4.8.1.1.2.g	V

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L14	A note was added that provides an exception to the requirements of Specification 3.0.3. Without this exception a unit shutdown would be required if the LCO and associated Actions are not met while moving irradiated fuel assemblies in Mode 1, 2, 3, or 4.	3.8.2 Actions Note, 3.8.5 Actions Note, 3.8.8 Actions Note, 3.8.10 Actions Note	3.8.1.2 Actions, 3.8.2.2 Actions, 3.8.3.2 Actions	III
3.8 L15	The Action to depressurize and vent the Reactor Coolant System (RCS) through at least a 2 inch square vent when any of the required buses are inoperable was replaced with an action to declare affected Low Temperature Overpressure Protection (LTOP) features inoperable. This change defers to a separate Specification for LTOP for the appropriate actions to assure the RCS is depressurized and vented when conditions dictate.	3.8.2 Action A, 3.8.5 Action A, 3.8.8 Action A, 3.8.10 Action A	3.8.1.2 Action, 3.8.2.2 Action c, 3.8.3.2 Action	III
3.8 L16	Three surveillances were deleted from the list of surveillances required to be performed for DG and offsite sources while shutdown. Surveillances testing the transfer of incoming offsite source from normal to alternate and the simultaneous start of both DGs were deleted because only one of each of these power sources is required in these Modes. The DG test mode override surveillance was deleted because the DGs are not required to be tested paralleled to the grid in these Modes. Also, though the function Operability continues to be required, several surveillances are not performed in order to prevent a single event which could compromise both the required offsite and DG source.	SR 3.8.2.1, SR 3.8.2.1 Note	4.8.1.2	VIII

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L17	In establishing a new Specification for new and stored DG fuel oil requirements, times were provided to restore the following conditions: 1) supply of < 7 days but > 6 days, 2) total particulates not within limit, and 3) other new fuel properties not within limits. These actions provide time to restore conditions which, under current requirements, would result in the DG being immediately declared inoperable.	3.8.3 Actions	3.8.1.1.b.2, 3.8.1.2.b.2	IV
3.8 L18	Not used.			
3.8 L19	The frequencies for determining the minimum average electrolyte temperature within 7 days after a battery discharge or overcharge were deleted because discharges and overcharges of the specified magnitude increase rather than decrease the temperature. Also, the method for verifying the average electrolyte temperature was relaxed from measuring all connected cells to only representative cells.	SR 3.8.6.3	4.8.2.1.2.b.3	V, VI
3.8 L20	Not used.			
3.8 L21	Not used.			
3.8 L22	A Note was added to allow several surveillances required to be performed for the DC power subsystem in Modes 1, 2, 3, and 4 not to be performed while shutdown in order to prevent the possibility of a single event which could compromise both divisions of DC power.	SR 3.8.5.1 Note	4.8.2.2	VIII

**Less Restrictive Change Categories**

- I Relaxation of LCOs and Administrative Controls
- II Relaxation of Applicability
- III Relaxation of action requirements
- IV Relaxation of Completion Time

- V Relaxation of SR acceptance criteria
- VI Relaxation of Surveillance Frequency
- VII Deletion of requirements redundant to regulation
- VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L23	In establishing a new Specification for battery cell parameter requirements, an appropriate Applicability and Actions Note were added to allow separate Condition entry for consistency with CTS intent.	3.8.6	3/4.8.2.1	III, IV
	With Category A or Category B parameter(s) out of specified limits, the completion time to restore the parameters was extended from a total of 7 days to 31 days since these parameters contain substantial margin for the batteries to perform their safety function. Also, an Action to verify, within 1 hour, the pilot cells' electrolyte level and float voltage is within Category C limits was added so that the affected battery may be considered Operable provided the specified verification and restoration Actions are taken.	3.8.6 Action A	Table 4.8-2 Notes 1 and 2	
3.8 L24	A note was added to the DG full load rejection test which states that momentary transients above the specified voltage limit do not invalidate the test because a momentary voltage spike is expected immediately following the load rejection .	SR 3.8.1.10 Note	4.8.1.1.2.f.3	V
3.8 L25	The acceptance criteria for several surveillances to load the DGs to $\geq 5500$ kW (the DGs continuous rating) was modified, in accordance with industry guidance, to specify a loading band of 4950 kW to 5500 kW (90% to 100% of the continuous rating) to reduce wear on the DGs while still banding the maximum expected accident load.	SR 3.8.1.3, SR 3.8.1.10, SR 3.8.1.14, SR 3.8.1.15 Note 1	4.8.1.1.2.a.5, 4.8.1.1.2.f.3, 4.8.1.1.2.f.7	V

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L26	The restriction for performing the manual transfer of power supply from the offsite circuit to the DGs "during shutdown" was removed because this surveillance may be satisfied while performing Station Auxiliary Transformer maintenance during power operation.	SR 3.8.1.8	4.8.1.1.1.b	VI
3.8 L27	The loading criteria for the first two hours of the DG 24 hour continuous run was modified from 5900 - 6050 kW to 5775 - 6050 kW to correspond to 105 - 110% of the DG continuous duty rating in accordance with industry guidance. The revised lower limit of the load band continues to represent loads greater than the maximum expected accident load.	SR 3.8.1.14	4.8.1.1.2.f.7	V
3.8 L28	An Action was added to address the situation of an inoperable DG and a bus with two required qualified circuits inoperable. This Action allows continued operation provided either the inoperable DG or the inoperable required qualified circuits are restored within 12 hours because the Byron/Braidwood design includes a reserve qualified circuit to each AC electrical power division.	3.8.1 Action D	3.8.1.1 Actions, 3.0.3	III
3.8 L29	The restriction for performing the DG auto-start on an ESF actuation signal and the noncritical trip bypass surveillances "during shutdown" was removed because these surveillances may be satisfied during power operation by required post-maintenance testing or by a valid actuation signal.	SR 3.8.1.12, SR 3.8.1.13	4.8.1.1.2.f.5, 4.8.1.1.2.f.6.c	VI
3.8 L30	The acceptance criteria for the average electrolyte temperature of the battery cells was modified from "above 60°F" to "≥ 60°F" for consistency with manufacturer's recommendations and other considerations.	SR 3.8.6.3	4.8.2.1.2.b.3	V

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.8 L31	The loading requirements for the monthly DG 1-hour run surveillance was modified to provide flexibility in applying the manufacturer's recommendations for gradual loading so that wear on the engine is reduced and reliability increased.	SR 3.8.1.3 Note 1	4.8.1.1.2.a.5	V
3.8 L32 (Bw)	The condition for allowance to extend the frequency of the battery capacity test from 12 months to 24 months provided the battery capacity is "greater than 100%" of the manufacturer's rated capacity" was modified to be based on the capacity being "> 100%" for consistency with industry standards.	SR 3.8.4.8	4.8.2.1.2.f	VI

**Less Restrictive Change Categories**

I Relaxation of LCOs and Administrative Controls	V Relaxation of SR acceptance criteria
II Relaxation of Applicability	VI Relaxation of Surveillance Frequency
III Relaxation of action requirements	VII Deletion of requirements redundant to regulation
IV Relaxation of Completion Time	VIII Deletion of Surveillance Requirements

(By) - Byron specific

(Bw) - Braidwood specific



**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.8, Electrical Power Systems</b>					
3.8 LA1	3.8.1.1, 3.8.1.2	Details of the Class 1E 4160 volt buses' offsite power sources and design features of the diesel generators (DGs).	Bases	ITS 5.5.14	1
3.8 LA2	4.8.1.1.2.a.4	Listing of test signals that may be used for the monthly DG start surveillance.	Bases	ITS 5.5.14	3
3.8 LA3	4.8.1.1.2.a.6	Surveillance to verify the DGs are aligned to the associated Emergency Safety Feature (ESF) buses.	Bases	ITS 5.5.14	2
3.8 LA4	4.8.1.1.2.a.4 Note *	Details describing the engine conditions for the modified DG start surveillance.	Bases	ITS 5.5.14	3
3.8 LA5	4.8.1.1.2.f.2	Details of the single largest post-accident load that each DG must be capable of rejecting without incurring an engine overspeed trip.	Bases	ITS 5.5.14	1
3.8 LA6	4.8.1.1.2.f.7	Details regarding the loading acceptance criteria for the first two hours of the DG 24-hour run surveillance.	Bases	ITS 5.5.14	3
3.8 LA7	4.8.1.1.2.f.7, 4.8.1.1.2.f.5	Details regarding the voltage and frequency acceptance criteria for the DG 24-hour run and auto-start surveillances.	TRM	§50.59	3
3.8 LA8	4.8.1.1.2.f.8	Details to ensure each DG loading is maintained within its acceptable design rating.	UFSAR	§50.59	1
3.8 LA9	4.8.2.1.2.b.2, 4.8.2.1.2.c.3	Method for obtaining the 125-volt battery connection resistance.	Bases	ITS 5.5.14	3

**Relocated Detail Types**

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|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
3.8 LA10	4.8.1.1.2.i, 4.8.1.1.2.j	Surveillances to verify the cross-tie capability of the DGs to power the opposite unit's ESF bus.	TRM	§50.59	1
3.8 LA11	4.8.1.1.2.f.13	Surveillance to verify "the DGs lockout features prevent starting only when required."	TRM	§50.59	3
3.8 LA12	4.8.1.1.2.h	Surveillances to clean the DGs fuel oil storage tanks and to perform a pressure test of portions of the diesel fuel oil system.	TRM	§50.59	3
3.8 LA13	3.8.1.2 Actions, 3.8.3.2 Actions	Action to suspend crane operation with loads over the spent fuel pool when AC electrical power sources or buses are inoperable.	TRM	§50.59	3
3.8 LA14	3.8.2.1.a and b, 3.8.2.2, 3.8.3.1.e, d,e,f, 3.8.3.1 Action b, 3.8.3.2.c	Details defining the Operability of the DC electric sources, instrument buses, and instrument bus inverters.	UFSAR Bases	§50.59 ITS 5.5.14	1
3.8 LA15	4.8.2.1.2.f	Details defining degradation of battery capacity.	Bases	ITS 5.5.14	3
3.8 LA16	4.8.1.1.2.g	Details of Operability demonstration after modifications which could affect DG interdependence.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.8, Electrical Power Systems</b>			
3.8 M1	The Surveillance Requirement to verify the transfer of fuel oil from the diesel generator (DG) storage tank to the day tank was modified to specify the automatic transfer capability.	SR 3.8.1.6	4.8.1.1.2.a.3
3.8 M2	Not used.		
3.8 M3	Additional requirements were imposed regarding energization of the required AC engineered safety feature (ESF) divisions from offsite and DG sources.	LCO 3.8.2 and 3.8.2 Action A	3.8.1.2, 3.8.1.2 Actions
	Additional requirements were imposed regarding energization of the required DC ESF divisions from the attendant batteries and chargers.	LCO 3.8.5 and 3.8.5 Action A	3.8.2.2, 3.8.2.2 Actions
	Additional requirements were imposed regarding energization of the required AC and DC ESF divisions, and AC instrument bus power distribution subsystems and the attendant inverters.	LCO 3.8.8 and 3.8.8 Action A, LCO 3.8.10 and 3.8.10 Action A	3.8.3.2, 3.8.3.2 Actions
3.8 M4	The Applicabilities were expanded to include "during movement of irradiated fuel assemblies" so that electrical power systems will be available to mitigate a fuel handling accident when the reactor vessel is defueled.	3.8.2 Applicability, 3.8.5 Applicability, 3.8.8 Applicability, 3.8.10 Applicability	3.8.1.2 Applicability, 3.8.2.2 Applicability, 3.8.3.2 Applicability
3.8 M5	The Action to immediately initiate action to restore inoperable electrical power systems was revised to apply regardless of plant conditions - whether reactor coolant loops are filled or whether the reactor vessel cavity is flooded.	3.8.2 Actions A and B, 3.8.8 Actions, 3.8.10 Actions	3.8.1.2 Actions, 3.8.3.2 Actions

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.8 M6	With at least one of two inoperable offsite AC circuits not restored within the prescribed time, an Action was included to further shutdown the unit from Mode 3 to Mode 5 in order to place the unit in a condition in which the LCO does not apply.	3.8.1 Action F	3.8.1.1 Action d
3.8 M7	The Completion Time for restoration of inoperable electrical power distribution subsystems was modified to "16 hours from discovery of failure to meet the LCO" the maximum time allowed to prevent indefinite operation while not meeting the LCO.	3.8.9 Actions A, B, and C,	3.8.2.1 Action d, 3.8.3.1 Actions a and b
3.8 M8	An Action was included to declare the Residual Heat Removal subsystem(s) inoperable and not operational when its supporting instrument bus is inoperable so that appropriate consideration is given to shutdown cooling systems that are without their required power.	3.8.10 Action A	3.8.3.2 Actions
3.8 M9	A requirement was included to require the DG's 60 minute load run to be performed immediately following, without shutdown, a 10 second start surveillance.	SR 3.8.1.3 Note 4	4.8.1.1.2.a.5
3.8 M10	The Table Notation (1) was modified by adding the phrase "AND once per 7 days thereafter" to verify battery cell parameters to remain within allowable limits.	3.8.6 Action A	Table 4.8-2 Note 1
3.8 M11	The DG minimum acceptable output voltage was increased to 3950 VAC to ensure that adequate voltage is available for equipment to perform their safety related functions in the event of a loss of offsite power.	SR 3.8.1.2, SR 3.8.1.7, SR 3.8.1.9, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.19	4.8.1.1.2.a.4, 4.8.1.1.2.f.2, 4.8.1.1.2.f.4, 4.8.1.1.2.f.5, 4.8.1.1.2.f.6
3.8 M12	The time for which a charging current of < 2 amps can be used to satisfy specific gravity requirements of connected battery cells was limited to 7 days following a battery recharge and the specific gravity shall be measured prior to the expiration of the 7 days limit.	Table 3.8.6-1 Note d	Table 4.8-2 Note 5

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.8 M13(Bw)	The allowance that the modified performance discharge test as well as the performance discharge test may be performed in lieu of the battery service test was restricted to allow only the modified performance discharge test to be substituted.	SR 3.8.4.7 Note 1	4.8.2.1.2.e

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.9, Refueling</b>			
3.9 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 3.9	3/4.9
3.9 A2	Notational information regarding reactor vessel head status was incorporated into the definition of Mode 6. The Surveillance Requirement to determine reactivity conditions before removing or unbolting the reactor vessel head was deleted as redundant to the requirements of STS SR 3.0.4.	Table 1.1-1, SR 3.0.4	3.9 Applicability, 4.9.1.1.a
3.9 A3	Obsolete, cycle-specific boron concentration limit was deleted.	LCO 3.9.1	3.9.1 and Actions
3.9 A4	Not used.		
3.9 A5 (By)	Obsolete, cycle-specific exception regarding the personnel hatch status was deleted.	LCO 3.9.4	3.9.4.a
3.9 A5 (Bw)	Obsolete, cycle-specific exceptions regarding the personnel and equipment hatch status were deleted.	LCO 3.9.4	3.9.4.a, 4.9.4.2
3.9 A6	The exception to having a minimum of one personnel hatch door closed and the equipment hatch in place during Core Alterations or movement of irradiated fuel within containment was reworded as a Note to clarify that this exception applies to both personnel hatch doors being open as well as the equipment hatch being removed since these doors are located within the equipment hatch.	LCO 3.9.4 Note, SR 3.7.13.3	3.9.4.a, 4.9.4.2

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
3.9 A7	The Action to suspend all operations involving an increase in the reactor decay heat load with no residual heat removal (RHR) loop in operation was revised to specify loading irradiated fuel assemblies as the operation that increases decay heat load.	3.9.5 Action A	3.9.8.1 Actions
3.9 A8	The explicit exception to the requirement to enter the default actions of LCO 3.0.3 to exit the Modes of applicability for this Mode 6 Specification was deleted since these provisions apply only to Modes 1, 2, 3, and 4 in STS.	3.9.4 Actions	3.9.9 Action B
3.9 A9	"All filled portions" of the Reactor Coolant System was clarified to be both the Reactor Coolant System and the refueling cavity components for the Mode 6 boron concentration Specification.	LCO 3.9.1, SR 3.9.1.1	3.9.1, 4.9.1.2
3.9 A10	A new Specification was added to provide separate requirements for valves used to isolate unborated water sources in Mode 6.	Specification 3.9.2	4.9.1.3
3.9 A11	Separate requirements for the Containment Purge Isolation System were reformatted and incorporated into the STS Specification for containment penetrations.	LCO 3.9.4.c	3.9.9 and Action a
3.9 A12	Not Used		

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 3.9, Refueling</b>				
3.9 L1	Performance of an Analog Channel Operational Test within 8 hours prior to start of Core Alterations and every 7 days thereafter was deleted and replaced by an 18 month Channel Calibration surveillance since these monitors are required for indication only in Mode 6.	SR 3.9.3.2	4.9.2.b, 4.9.2.c	V, VI
3.9 L2	The frequency for verifying each containment purge isolation valve closes on an actuation signal was relaxed from 7 days to 18 months since the performance of other SRs ensure the Operability of the system and the containment isolation function. Also, the containment penetrations are verified to be in their "required status" rather than their "closed/isolated condition", ensuring that each penetration is either isolated or is not blocked from closing.	SR 3.9.4.1, SR 3.9.4.2	4.9.4.1, 4.9.9	VI
3.9 L3	The surveillance to determine the reactivity conditions prior to withdrawal of any full-length control rod in excess of 57 steps from its fully inserted position was deleted as redundant to the combination of the LCO requirement for maintaining boron concentration within limits and plant procedures for verifying the correct loading plan.	N/A	4.9.1.1.b	VIII

**Less Restrictive Change Categories**

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|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
3.9 L4	The provision allowing residual heat removal (RHR) operation to be suspended for up to 1 hour per 8-hour period was relaxed to allow actions other than performance of Core Alterations in the vicinity of the reactor vessel hot legs. Without this change, the STS definition of Core Alterations would unnecessarily restrict refueling operation activities in the vicinity of the hot legs that do not affect core reactivity.	LCO 3.9.5 Note	3.9.8.1	I
3.9 L5	The reactor vessel (refueling cavity) water level specification was changed to remove its Applicability during movement of fuel assemblies or control rods, and to replace it with a requirement to maintain minimum water level during Core Alterations, except for latching and unlatching of control rod drive shafts, and during movement of irradiated fuel assemblies within containment. Since movement of a control rod constitutes a Core Alteration (STS definition), the applicability remains equivalent with the explicit exception of latching and unlatching control rod drive shafts. The exception for latching and unlatching control rods is acceptable because the upper internals are installed, preventing the dropping of a fuel assembly or control rod into the core. For movement of fuel assemblies, the minimum water level is applicable only to the movement of irradiated fuel regardless of whether the fuel assemblies are seated in the reactor vessel. This is sufficient to satisfy accident analysis assumptions.	3.9.7 Applicability	3.9.10 Applicability, 4.9.10	II

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>	<b>Change Category</b>
3.9 L6	The explicit requirement to determine that the water level in the reactor cavity is at least its minimum required depth within 2 hours prior to the start of movement of fuel assemblies within containment was deleted since SR 3.0.4 requires the performance of surveillances within their specified frequency prior to entering the conditions specified in the Applicability. The resulting requirement is to perform this surveillance within 24 hours of the start of fuel movement which is considered adequate.	SR 3.9.7.1, SR 3.0.4	4.9.10	VI
3.9 L7	The LCO requirement for isolating penetrations providing direct access from containment atmosphere to outside atmosphere was relaxed to allow use of alternate methods that are equivalent to automatic or manual isolation valves, or blind flanges, to provide additional flexibility.	LCO 3.9.4.c.1	3.9.4.c.1	I
3.9 L8	The requirement to verify that the containment purge valves actuate to the isolation position on an engineered safety feature test signal was changed to allow the use of an actual as well as a simulated actuation signal since Operability can be adequately demonstrated with either signal.	SR 3.9.4.2	4.9.4.1, 4.9.9	V
3.9 L9	The explicit requirement to demonstrate the Operability of the containment purge isolation valves within 100 hours prior to the start of Core Alterations or movement of irradiated fuel within the containment was deleted since SR 3.0.4 requires the performance of surveillances within their specified frequency prior to entering the conditions specified in the Applicability.	SR 3.9.4.1, SR 3.9.4.2, SR 3.0.4	4.9.4.1, 4.9.9	VIII

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>	<b>Change Category</b>
3.9 L10	The LCO requirement that one of the two required Source Range Neutron Flux Monitors have audible indication in the containment and control room was deleted because there is no design requirement for the audible alarm.	LCO 3.9.3	3.9.2	I
3.9 L11	The LCO which requires that two RHR loops be Operable with at least one loop in operation was relaxed to allow the one required operating loop to be removed from operation to support filling and draining the reactor cavity when aligned to, or during transitioning to or from, the refueling water storage tank or to support required testing. The RHR loop is considered Operable provided the loop is capable of being realigned to the reactor coolant system.	LCO 3.9.6 Note	3.9.8.2	I

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

Table LA - Details Relocated from CTS

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 3.9, Refueling</b>					
3.9 LA1	3.9.1, 3.9.1 Actions	Specific value for the minimum boron concentration.	COLR	\$50.59	1
3.9 LA2	3.9.1, 3.9.1 Actions	Requirement to maintain a $k_{eff} \leq 0.95$ and a minimum boron concentration at a limit that ensures that value.	Bases	ITS 5.5.14	2
3.9 LA3	3.9.1 Actions	Flow rate and concentration for restoring minimum boron concentration within limit.	TRM	\$50.59	2
3.9 LA4	4.9.1.3	Listing of ID numbers of unborated water source isolation valves.	Bases	ITS 5.5.14	3
3.9 LA5	4.9.1.3	Methods by which the unborated water source isolation valves are verified closed and secured in position.	Bases	ITS 5.5.14	3
3.9 LA6	3/4.9.3	Time limit on reactor subcriticality prior to the movement of irradiated fuel assemblies.	TRM	\$50.59	1
3.9 LA7	3.9.1	General reference to the areas which are hydraulically coupled to the reactor core during refueling operations.	Bases	ITS 5.5.14	1
3.9 LA8	4.9.1.2	Reference to chemical analysis as the method for determining boron concentration.	Bases	ITS 5.5.14	3
3.9 LA9	3.9.2	Continuous visual indication in the Control Room for each Source Range Neutron Flux Monitor.	Bases	ITS 5.5.14	1

Relocated Detail Types

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
3.9 LA10	4.9.8.1, 4.9.8.2	Reactor Coolant System (RCS) temperature acceptance criteria for residual heat removal (RHR) system loop testing.	TRM	§50.59	3
3.9 LA11	3/4.9.10	Requirement for maintaining the specified water level over the top of the reactor vessel flange when moving non-irradiated fuel assemblies.	TRM	§50.59	3

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**Relocated Detail Types**

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|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific

(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 3.9, Refueling</b>			
3.9 M1	CTS LCO and Actions do not address unborated water source isolation valves. New Actions were added, when one or more valves are not secured in their closed position, to suspend Core Alterations, to secure the valves in closed position, and to verify shutdown margin (SDM) is within limit.	3.9.2	N/A
3.9 M2	An Action was included to immediately initiate action to restore one source range neutron flux monitor (SRM) to Operable status whenever both SRMs are inoperable.	3.9.3 Action B	3.9.2 Actions
3.9 M3	The Action to suspend all operations involving an increase in the reactor decay heat load or a reduction in boron concentration of the reactor coolant system (RCS) was explicitly revised to be performed "immediately."	3.9.5 Action A	3.9.8.1 Actions
3.9 M4	The Action to suspend all operations involving a reduction in boron concentration of the RCS was explicitly revised to be performed "immediately."	3.9.6 Action B	3.9.8.2 Action b
3.9 M5	A Surveillance Requirement was added to verify every 7 days correct breaker alignment and indicated power available to the residual heat removal (RHR) pump that is not in operation.	SR 3.9.6.2	N/A
3.9 M6	The Actions have been changed to include the additional restriction of suspending movement of irradiated fuel assemblies within containment and are now applicable any time refueling cavity water level is below its limit, rather than in Mode 6 only.	3.9.7 Applicability and Action A	3.9.10 Applicability and Actions
3.9 M7	The Action to establish $\geq 23$ feet of water above the reactor vessel flange "as soon as possible" was revised to initiate the action "immediately."	3.9.6 Action A	3.9.8.2 Action a
3.9 M8	A Surveillance Requirement was added to verify the isolation time of each required containment purge valve is within limits per the Inservice Testing Program.	SR 3.9.4.3	N/A

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
3.9 M9	The allowance that the Operable RHR loop may be removed from operation for up to 1 hour per 8-hour period was restricted by the phrase "provided no operations are permitted that would cause reduction of the RCS boron concentration."	LCO 3.9.5 Note	3.9.8.1

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 4.0, Design Features</b>			
4.0 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 4.0	Section 5.0
4.0 A2	A general description of the site location was included.	4.1.1	5.1
4.0 A3	Information was deleted regarding fuel enrichment and the acceptability of fuel storage in accordance with station criticality analyses.	4.2.1	5.3.1
4.0 A4	Not used.		
4.0 A5	Obsolete limit on the $k_{eff}$ for storing the initial core in the spent fuel pool was deleted.	5.6	5.6.1.2
4.0 A6	Not used.		

(By) - Byron specific  
(Bw) - Braidwood specific



**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement	Change Category
<b>ITS Section 4.0, Design Features</b>				
4.0 L1	An allowance was included to permit placement of a limited number of lead test assemblies that have not completed representative testing into nonlimiting regions of the core without requiring a Commission approved TS change in advance.	4.2.1	5.3.1	I

**Less Restrictive Change Categories**

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|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 4.0, Design Features</b>					
4.0 LA1	5.2, 5.4, 5.5	Design details and features of the containment building, reactor coolant system, and station meteorological tower location.	UFSAR	\$50.59	1
4.0 LA2	5.3	Details of fuel assembly and control rod assembly design.	UFSAR	\$50.59	1
4.0 LA3	5.1.1, 5.1.2, 5.1.3, Figures 5.1-1 and 5.1-2	Maps and information regarding the site Exclusion Area, Low Population Zone, unrestricted area boundary, and site boundary.	UFSAR	\$50.59	1

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
<b>ITS Section 4.0, Design Features</b>			
None			

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 5.0, Administrative Controls</b>			
5.0 A1	Editorial rewording, reformatting, and renumbering changes were made to conform with conventions used in Westinghouse Standard Technical Specifications NUREG-1431(STS).	Section 5.0	Sections 1.0, 4.0, and 6.0, Specifications 3/4.3.3.6, 3/4.4.5, 3/4.4.9, 3/4.6.1.2, 3/4.7.6, and 3/4.7.7, 4.8.1.1.2,
5.0 A2	Unit 1 cycle-specific values and limitations regarding maximum calculated containment accident pressure and containment vessel tendon sheathing filler grease voids were deleted since the applicable cycles (7 for Braidwood, 8 for Byron) have been completed.	5.5.16, 5.5.6	1.20.a, 6.8.4.g
5.0 A3	The explicit requirement for a licensed operator with sole responsibility for observing Core Alterations was deleted since this requirement is contained in 10 CFR 50.54. Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	5.2.2	6.2.2.d, Table 6.2-1 Footnote (e)
5.0 A4	The explicit requirement to notify and submit a report to the Commission of any Reportable Event was deleted since this requirement is contained in 10 CFR 50.73. Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	N/A	6.6.1.a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A5	The explicit requirement to establish and maintain procedures to implement the Security Plan and the Emergency Response Plan were deleted since these requirements are contained in 10 CFR 50, Appendix E and 10 CFR 50.54(p). Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	5.4.1	6.8.1.c, 6.8.1.d
5.0 A6	Not used.		
5.0 A7	CTS 3.6.1.3.b was modified to add a "≥" when referring to air lock test pressure. The intent of the CTS is to use a minimum pressure to evaluate leakage, not to test at design accident pressure.	5.5.16.b.1	3.6.1.3.b
5.0 A8 (By)	The requirement for submittal of the initial Annual Reports following initial criticality was deleted. This requirement is no longer applicable to operation of the units since the initial reporting period has been completed.	5.6.1	6.9.1.4
5.0 A9	Not used.		
5.0 A10	A note was included to clarify that separate Annual Reports need not be submitted for each unit; instead a single report may be submitted for the facility.	5.6.1 Note	6.9.1.5
5.0 A11	A reference to 10 CFR 50.36a was included as a reference for the required content of the Radioactive Effluent Release Report.	5.6.3	6.9.1.7

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A12	CTS Specifications 6.9.1.8, 6.9.1.9, and 6.9.2 were revised to delete the reference to the submittal location for the Monthly Operating Report, Core Operating Limits Report, and Special Reports. Explicit distribution requirements were deleted since these requirements are contained in 10 CFR. Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	5.6.4, 5.6.5.d	6.9.1.8, 6.9.1.9, 6.9.2
5.0 A13	The CTS 6.9.1.7 ** (footnote) has been revised to delete information that is not applicable to Byron and Braidwood. The radwaste systems are common to the units. Therefore, reporting releases from each unit is not applicable. This change is editorial and does not involve a technical change.	5.6.3	6.9.1.7**
5.0 A14	Not used.		
5.0 A15	CTS 6.12.1 and 6.14.1.a.2 were revised to incorporate references consistent with 10 CFR 20. Plant requirements remain the same, the change is a change in presentation only.	5.7.1, 5.5.1.c.1.ii	6.12.1, 6.14.1.a.2
5.0 A16	Not used.		
5.0 A17	The explicit requirement to perform inservice inspection and testing in accordance with Section XI of the ASME Boiler and Pressure Vessel Code was deleted since this requirement is contained in 10 CFR 50.55a(g). This change is considered less restrictive; therefore, see Table L.	5.5.8	4.0.5.a

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A18	CTS Specification 4.0.5.b has been revised to add a definition. A definition for "biennially or every 2 years" was included for inservice inspection and testing activities specifying this frequency. This change only clarifies the meaning of the term and does not add any new requirement.	5.5.8.a	4.0.5.b
5.0 A19	CTS Specification 4.0.5.d has been deleted. Specifically, the statement that inservice inspection and testing activities shall be in addition to other specified SRs was deleted. Explicit statement on this general requirement is redundant and unnecessary.	5.5.8	4.0.5.d
5.0 A20	CTS Specification 4.0.5 has been revised. A statement was included to clarify that the allowance for a period of up to 24 hours upon discovery of a missed surveillance applies to Inservice Testing Program activities. This explicit statement is necessary to retain the current allowance in Programs where the default provisions of ITS SR 3.0.3 are not generally applicable.	5.5.8.c	4.0.3, 4.05
5.0 A21	CTS SR 4.4.5.3 has been revised. A statement was included that to clarify that the allowance for a 25% surveillance interval extension does not apply to Steam Generator Tube Surveillance Program activities. This explicit statement is necessary to retain the current requirement in Programs where the default provisions of ITS SR 3.02 are not generally applicable. This is necessary since the testing requirements are being reformatted to ITS Specification 5.5.9 where the statements of applicability are generally not applied. This change maintains current requirements and is considered a presentation change only.	5.5.9.d	4.0.2, 4.4.5.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
5.0 A22 (By)	CTS 4.7.7 includes an allowable flow rate range, which is stated as "...between 55,669 cfm and 68,200 cfm..." Consistent with other NUREG-1431 HVAC flow requirements, SR 3.7.12.4 states the flow rate requirement as "... $\geq$ 55,669 cfm and $\leq$ 68,200 cfm..." The addition of "equals to" is considered administrative because the SER for Byron Amendment 56, which changed the flow rates states, "...the revised minimum acceptable system flow rate was calculated to be 55,669 cfm..." This indicates that a flow rate of 55,669 is acceptable.	5.5.11	4.7.7
5.0 A23	Filter testing requirements for the Control Room Ventilation Filtration, the Nonaccessible Area Exhaust Filter Plenum Filtration, and the Fuel Handling Building Exhaust Filter Plenum Ventilation systems were reformatted and incorporated as the Ventilation Filter Testing Program (VFTP).	5.5.11	4.7.6, 4.7.7, 4.9.12
5.0 A24	Not used.		
5.0 A25	Cross reference to SRs for testing purge valves was deleted because compliance with other Specifications is required in ITS without "cross referencing."	5.5.16	4.6.1.2.f
5.0 A26	CTS 4.6.1.2 was revised to include a statement to clarify that the allowance for a period of up to 24 hours upon discovery of a missed surveillance applies to Containment Leakage Rate Testing Program activities. This explicit statement is necessary to retain the current allowance in Programs where the default provisions of ITS SR 3.0.3 are not generally applicable. This change is necessary since the CTS requirements are being relocated from the TS, and a program described in ITS Specification 5.5.16 is being added where statements of applicability generally are not applied. This change maintains current requirements and is a presentation change only.	5.5.16	4.0.3, 4.6.1.2

(By) - Byron specific  
(Bw) - Braidwood specific



**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A27	A statement was included to clarify that the allowance for a 25% surveillance interval extension and the allowance for a delay period of up to 24 hours upon discovery of a missed surveillance apply to the Explosive Gas and Storage Tank Radioactivity Monitoring Program activities. This explicit statement is necessary to retain the current requirement in Programs where the default provisions of ITS SRs 3.0.2 and 3.0.3 are not generally applicable.	5.5.12	3.11.1, 3.11.2, 4.0.2, 4.0.3
5.0 A28	The explicit control room manning requirements by licensed operators was deleted since these requirements are contained in 10 CFR 50.54(m)(iii) and 50.54(k). Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	5.2.2	6.2.2.a, 6.2.2.b
5.0 A29 (By)	Consistent with CTS Section 6, CTS 6.9.1.4 was revised to reference the "facility" versus "unit." Specification 6.1.9 covers Annual Reports for which one report is prepared, covering the operation of both units or the "facility." This is an administrative change.	5.6.1	6.9.1.4
5.0 A30	CTS 6.9.1.9 details the general topic associated with the listed topical reports that are applicable to the COLR. These general topic details were deleted. This is information-only and does not reflect the technical or interpretational guidance. This change is consistent with NUREG-1431.	5.6.5	6.9.1.9
5.0 A31	Consistent with ITS LCO 3.1.1, "Shutdown Margin," referencing the COLR reference to LCO 3.1.1 is added to CTS Specification 6.9.1.9. This is an administrative change, keeping the ITS Specifications consistent.	5.6.5.a	6.9.1.9
5.0 A32	Based on utilization of WCAP-10216 as a basis for the F <sub>0</sub> Surveillance Frequency in Specification 3.2 and the requirements stated in the WCAP SEA, reference to the WCAP was added to CTS Specification 6.9.1.9. This is an administrative change, reflecting commitments contained in the NRC's evaluation of the WCAP..	5.6.5.b.11	6.9.1.9

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
5.0 A33	The CTS Table 4.4-2 requirement to notify the Commission of certain steam generator degraded/defective conditions was deleted since this requirement is encompassed by 10 CFR 50.72(b)(2). Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	Table 5.5.9-2	Table 4.4-2
5.0 A34	The explicit requirement to perform inservice inspection and testing of steam generators in accordance with Section XI of the ASME Boiler and Pressure Vessel Code was deleted since this requirement is encompassed by 10 CFR 50.55a(g). Conformance to 10 CFR is a condition of the license. This change is considered less restrictive; therefore, see Table L.	5.5.9	4.4.5.0, 4.0.5
5.0 A35	Not used.		
5.0 A36	Cross reference to a Specification limiting containment leakage rates was deleted. The technical requirements remain the same. This is change in presentation only.	N/A	1.7.d
5.0 A37	Not used.		
5.0 A38	A statement was included to clarify that the allowance for a 25% surveillance interval extension and the allowance for a delay period of up to 24 hours upon discovery of a missed surveillance apply to the Pre-Stressed Concrete Containment Tendon Surveillance Program and VFTP Program activities. This explicit statement is necessary to retain the current requirement in Programs where the default provisions of ITS SRs 3.0.2 and 3.0.3 are not generally applicable.	5.5.6, 5.5.11	3/4.6.1.6, 3.9.12, 4.7.7, 6.8.4.g, 4.0.2, 4.0.3

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A39	ANSI N510-1980 and ASTM D3803-1987 were included as a references in the VFTP for the applicable testing protocol for the Control Room Ventilation Filtration, the Nonaccessible Area Exhaust Filter Plenum Filtration, and the Fuel Handling Building Exhaust Filter Plenum Ventilation systems.	5.5.11	4.7.6, 4.7.7, 4.9.12
5.0 A40	The CTS programs and reporting requirements were marked up to reflect the Pre-Stressed Concrete Containment Tendon Surveillance Program changes requested in an Amendment request dated June 17, 1997.	5.5.6	6.8.4.g, 6.9.1.11
5.0 A41	ITS Specification 5.7.1 (CTS 6.12.1) was revised to add a clarification to differentiate the alternate methods for controlling access to high radiation areas from those methods to control access to very high radiation areas as defined in 10 CFR 20. Recent discussions with NRC provided the following statement: "This Specification provides alternate methods for controlling access to high radiation areas and does not apply to very high radiation areas as defined in 10 CFR 20." This statement is for clarity and does not change any requirements or the methods on how high radiation areas are treated in the plant.	5.7	6.12.1
5.0 A42	ITS 5.7 (CTS 6.12) has been revised by adding clarification to describe the minimum requirements of a Radiation Work Permit.	5.7.1, 5.7.2.b	6.12.1, 6.12.2
5.0 A43	CTS 6.12.e was revised by adding a clarification regarding the practice of disseminating dose rate information to individuals entering high radiation areas.	5.7.2.e	6.12.2
5.0 A44	A listing of pertinent regulations, codes, and standards for conducting the activities of the Pre-Stressed Concrete Containment Tendon Surveillance Program was included to specify requirements to which the licensee has previously committed.	5.5.6	3/4.6.1.6, 6.8.4.g

(By) - Byron specific  
(Bw) - Braidwood specific

**Table A - Administrative Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>CTS Requirement</b>
5.0 A45	The method and content for submitting a Tendon Surveillance Report of any abnormal degradation of the containment structure was changed from a separate report to the Commission within 30 days to inclusion of the report in the Inservice Inspection Summary Report for consistency with current requirements.	5.6.8	3/4.6.1.6, 6.9.1.11
5.0 A46	All programs specified in ITS 5.5 were included as activities requiring written procedures to be established, implemented, and maintained. This change only clarifies current practice and does not add or delete any new or existing requirement.	5.4.1.d	6.8.1
5.0 A47	CTS 4.4.5.3 has been revised to clarify that the inservice inspection frequency of the Steam Generator Tube Surveillance Program depends on previous inspection results.	5.5.9.d	4.4.5.3
5.0 A48	The surveillance for verifying the total particulate contamination of diesel generator fuel oil was revised to more specifically cite the ASTM method for testing this parameter. Also, a statement was included to clarify that the allowance for a 25% surveillance interval extension and the allowance for a delay period of up to 24 hours upon discovery of a missed surveillance apply to the Diesel Fuel Oil Testing Program activities. This explicit statement is necessary to retain the current requirement in Programs where the default provisions of ITS SRs 3.0.2 and 3.0.3 are not generally applicable.	5.5.13	4.0.2, 4.0.3, 4.8.1.1.2.e
5.0 A49	All requirements and references to Unit 1 SGs were deleted since these Westinghouse Model D4 SGs have been replaced.	5.5.9, 5.6.9	3/4.4.5

(By) - Byron specific  
(Bw) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	C'S Requirement	Change Category
<b>ITS Section 5.0, Administrative Controls</b>				
5.0 L1	With less than the required channels of Post Accident Monitoring high range area radiation or main steam line radiation instruments Operable, the action to initiate an alternate method of monitoring the affected parameter within 72 hours was relaxed such that if the channel is not restored within 7 days, then the requisite Special Report to the Commission shall provide an outline of the preplanned alternate method of monitoring. This change is consistent with NUREG-1431.	3.3.3 Action H, 5.6.7	3.3.3.6 Action c	III
5.0 L2	For consistency with current radiation protection regulations and industry standards and practice, alternate methods were provided for controlling personnel access to high radiation areas.	5.7	6.12	I
5.0 L3 (Bw)	The requirement to verify flow distribution through each bank of Nonaccessible Area Exhaust Filter Plenum Ventilation System trains when testing the High Efficiency Particulate Air (HEPA) and charcoal adsorber filters was deleted, except after structural maintenance on the filter housings, since flow distribution between banks is a fixed parameter.	5.5.11	4.7.7.b, 4.7.7.d, 4.7.7.e, 4.7.7.f	III
5.0 L4	Not used.			

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(BW) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	C'S Requirement	Change Category
5.0 L5	The required contents of the annual Occupational Radiation Exposure Report were revised to reflect revision to 10 CFR Part 20. The changes include requiring the report to include only those personnel for whom monitoring was performed, use of current dose terminology, a later submittal date, and additional acceptable methods of estimating dose assignments.	5.6.1	6.9.1.5.a	I
5.0 L6	The required submittal date for the Annual Report covering occupational radiation exposure was relaxed from March 1 to April 30 of each year and the required submittal date for the Annual Radiological Environmental Operating Report was relaxed from May 1 to May 15 of each year to allow additional time for report preparation. Also, an allowance that a single report may be submitted for both units was included.	5.6.1, 5.6.2	6.9.1.4, 6.9.1.6	IV
5.0 L7	Ventilation filter testing performed "in accordance with" applicable Regulatory Guides or ANSI Standards was revised to state that testing be performed "in conformance with..." Regulatory Guide 1.52, Revision 2, and ANSI N510-1980 with any exceptions to either the Regulatory Guide or the ANSI Standard noted in Appendix A of the UFSAR. This provides the capability for justified variances between the Regulatory Guide/ANSI Standard and the implementing procedures.	5.5.11	4.7.6, 4.7.7, 4.9.12	V
5.0 L8	Specific allowances were included such that credit may be taken for verification of stated flow rates during the performance of other specified ventilation filter system surveillances consistent with current practice. Also, the methyl iodine penetration limits were relaxed for each system to comply with ASTM D 3803-1989 standards	5.5.11	3/4.7.6, 3/4.7.7, 3/4.9.12	V

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(BW) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	C'S Requirement	Change Category
5.0 A3	The requirement for a licensed operator observing Core Alterations was deleted since this requirement is contained in 10 CFR 50.54. Conformance to 10 CFR is a condition of the license. Specific identification of this requirement in the TS would be duplicative and is not necessary.	5.2.2	6.2.2.d, Table 6.2-1 Footnote (e)	VII
5.0 A4	The requirement to notify and submit a report to the Commission of any Reportable Event was deleted since this requirement is contained in 10 CFR 50.73. Conformance to 10 CFR is a condition of the license. Specific identification of this requirement in the TS would be duplicative and not necessary.	N/A	6.6.1.a	VII
5.0 A5	The procedures to establish and maintain procedures to implement the Security Plan and the Emergency Response Plan were deleted since these requirements are contained in 10 CFR 50, Appendix E and 10 CFR 50.54(p). Conformance to 10 CFR is a condition of the license. Specific identification of these plans in the TS would be duplicative and not necessary.	5.4.1	6.8.1.c, 6.8.1.d	VII
5.0 A12	C'S Specifications 6.9.1.8, 6.9.1.9, and 6.9.2 were revised to delete the reference to the submittal location for the Monthly Operating Report, Core Operating Limits Report, and Special Reports. The requirements relate to report submittal are contained in 10 CFR.	5.6.4, 5.6.5.d	6.9.1.8, 6.9.1.9, 6.9.2	VII

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(BW) - Braidwood specific

**Table L - Less Restrictive Changes to CTS**

<b>Discussion of Change</b>	<b>Description of Change</b>	<b>ITS Requirement</b>	<b>C'S Requirement</b>	<b>Change Category</b>
5.0 A17	The requirement to perform inservice inspection and testing in accordance with Section XI of the ASME Boiler and Pressure Vessel Code has been deleted. The requirement to perform ASME Section XI testing is denoted in 10 CFR 50.55a(g). Since conformance to 10 CFR is a condition of the license, specific identification of this requirement in the TS would be duplicative and not necessary.	5.5.8	4.05.a	VII
5.0 A28	The control room manning requirements by licensed operators was deleted since these requirements are contained in 10 CFR 50.54(m)(iii) and 50.54(k). the STS 5.2.2.b requirements will be met through compliance with these regulations.	5.2.2	6.2.2.b	VII
5.0 A33	The C'S Table 4.4-2 10 CFR 50.72(b)(2) reporting requirement is deleted. Deletion of the C'S requirement does not change the requirement to report results that satisfy the criteria for 10 CFR 50.72(b)(2).	Table 5.5.9-2	Table 4.4-2	VII
5.0 A34	The requirement to perform inservice inspection and testing of steam generators in accordance with Section XI of the ASME Boiler and Pressure Vessel Code was deleted since this requirement is encompassed by 10 CFR 50.55a(g). Conformance to 10 CFR is a condition of the license. Identification of this requirement in the TS is duplicative and not necessary.	5.5.9	4.4.5.0, 4.0.5	VII

**Less Restrictive Change Categories**

- |  |  |
|--|--|
| I Relaxation of LCOs and Administrative Controls | V Relaxation of SR acceptance criteria               |
| II Relaxation of Applicability                   | VI Relaxation of Surveillance Frequency              |
| III Relaxation of action requirements            | VII Deletion of requirements redundant to regulation |
| IV Relaxation of Completion Time                 | VIII Deletion of Surveillance Requirements           |

(By) - Byron specific

(BW) - Braidwood specific



**Table LA - Details Relocated from CTS**

Discussion of Change	CTS Reference	Description of Relocated Details	New Location	Control Process	Type
<b>ITS Section 5.0, Administrative Controls</b>					
5.0 LA1	6.2.2.a, Table 6.2-1	Descriptive information regarding minimum requirements for shift crew composition.	TRM	§50.59	3
5.0 LA2	6.2.3	Descriptive information and functional requirements regarding the Independent Safety Engineering Group.	QA Manual	§50.54(a)	3
5.0 LA3	6.4	Descriptive information regarding the requirements for facility staff training and retraining.	UFSAR	§50.59	3
5.0 LA4	6.6.1.b	Requirements for plant review of each Reportable Event.	QA Manual	§50.54(a)	3
5.0 LA5	6.8.1.e, 6.13	Requirements for procedures for implementing and controlling changes to the Process Control Program.	TRM	§50.59	3
5.0 LA6	6.8.2, 6.8.3	Requirements for technical review and control of procedures and procedure changes.	QA Manual	§50.54(a)	3
5.0 LA7	6.8.4.b	Elements to be included in the In-Plant Radiation Monitoring Program.	TRM	§50.59	3
5.0 LA8	6.8.1.f, 6.8.4.f	Requirements for implementation of the Offsite Dose Calculation Manual (ODCM) and the Radiological Environmental Monitoring Program.	TRM	§50.59	3
5.0 LA9	6.9.1.5.b	Information to be included in an annual report regarding any exceedance of primary coolant specific activity limits.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific

(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
5.0 LA10	6.10, 6.14.a	Retention requirements and listings of pertinent records of activities important to plant safety. Relocation of these CTS provisions to UFSAR Chapter 17 provide adequate controls over record retention requirements.	QA Manual	§50.54(a)	3
5.0 LA11	6.11	Requirements for procedures for implementing the Radiation Protection Program.	TRM	§50.59	3
5.0 LA12	4.7.6, 4.7.7, 4.9.12	Details of the testing criteria for the Control Room Ventilation, Non-accessible Area Exhaust Filter Plenum Ventilation, and Fuel Handling Building Ventilation Systems filters.	TRM	§50.59	3
5.0 LA13	6.14.1.b	Requirement for the Onsite Review and Investigative Function to review and approve changes to the ODCM.	TRM	§50.59	3
5.0 LA14	3/4.6.1.6, 4.6.1.2.g	Programmatic requirements for maintaining the structural integrity of the containment vessel.	5.5.6 Program, 5.6.8 Report	§50.59	3
5.0 LA15	4.8.1.1.2.d, 4.8.1.1.2.e	Detailed requirements for sampling and analyzing diesel fuel oil.	TRM	§50.59	3
5.0 LA16	5.7.1, Table 5.7-1	Listing of component cyclic or transient limits.	TRM	§50.59	1
5.0 LA17(By )	4.0.5.b	Specific edition and addenda of the ASME Section XI Code for inservice inspection and testing surveillance intervals.	TRM	§50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
5.0 LA18	6.9.1.1, 6.9.1.2, 6.9.1.3	Requirements for a Startup Report to be submitted following certain specified events.	TRM	\$50.59	3
5.0 LA19	Not used.				
5.0 LA20	3/4.11.1.4, 3/4.11.2.5, 3/4.11.2.6	Detailed requirements for explosive gas and storage tank radioactivity monitoring.	5.5.12 Program	\$50.59	3
5.0 LA21	Not used.				
5.0 LA22	SR 4.4.9.1.2	Reactor vessel material irradiation surveillance specimen examination schedule.	5.6.6 Report	\$50.59	1, 3
5.0 LA23	4.4.10	Details of volumetric and visual inspection techniques for reactor coolant pump flywheels.	5.5.7 Program	\$50.59	3
5.0 LA24	4.6.1.2, 4.6.1.3.a, 4.6.1.3.d	Detailed requirements for containment leakage rate and containment air lock testing to be relocated to the "Containment Leakage Rate Testing Program.".	5.5.16 Program	\$50.59	3
5.0 LA25	Not used.				
5.0 LA26	6.1.2	Responsibility of the Shift Engineer for directing the Control Room command function and the daily operations of the facility.	TRM	\$50.59	3

**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table LA - Details Relocated from CTS**

<b>Discussion of Change</b>	<b>CTS Reference</b>	<b>Description of Relocated Details</b>	<b>New Location</b>	<b>Control Process</b>	<b>Type</b>
5.0 LA27	6.2.2.e	Administrative procedures to limit the working hours of facility staff who perform safety-related functions.	TRM	§50.59	3
5.0 LA28	6.1.1, 6.1.2, 6.2.1, 6.2.2, 6.14.1.b	Use of plant-specific position titles have been replaced with generic titles. This is consistent with Generic Letter 88-06 which recommends, as a line item improvement, the relocation of corporate and unit organization charts to licensee controlled documents.	QA Manual	§50.54(a)	3

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**Relocated Detail Types**

- |                                   |  |
|-----------------------------------|--|
| 1 Details of System Design        | 3 Procedural Details for Meeting TS Requirements |
| 2 Description of System Operation |  |

(By) - Byron specific  
(Bw) - Braidwood specific

**Table M - More Restrictive Changes to CTS**

Discussion of Change	Description of Change	ITS Requirement	CTS Requirement
<b>ITS Section 5.0, Administrative Controls</b>			
5.0 M1	Not used.		
5.0 M2	Two new programs are required by STS. The TS Bases Control Program is provided to denote the appropriate methods and reviews necessary to change the Bases. The Safety Function Determination Program is provided to implement the support/supported system Operability evaluation.	5.5.14, 5.5.15	N/A
5.0 M3	The performance of a pressure drop test across the combined High Efficiency Particulate Air (HEPA) filters and charcoal adsorber banks of the associated ventilation systems was revised to specify that the tests be performed in general conformance with Regulatory Guide 1.52, Revision 2 and ANSI N510-1980.	5.5.11.d	4.7.6.e.1, 4.7.7.d.1, 4.9.12.d.1
5.0 M4	A requirement was added to ITS 5.7.2.e (CTS 6.12.e) that individuals escorted into high radiation areas will receive a pre-job briefing prior to entry.	5.7.2.e	6.12.2

(By) - Byron specific  
(Bw) - Braidwood specific

**Table R - Relocated CTS**

Discussion of Change	Relocated CTS	Description of Relocated CTS	New Location	Control Process
CTS Section 1.0, Definitions				
Not applicable				
CTS Section 2.0, Safety Limits				
Not applicable				
CTS Section 3/4.0, Applicability				
None				
CTS Section 3/4.1, Reactivity Control Systems				
3.1 R1	3/4.1.1.1 for Modes 1 and 2 with $k_{eff} \geq 1.0$ , 4.1.1.2.a	Shutdown Margin - $T_{avg} > 200^{\circ}\text{F}$	TRM	§50.59
3.1 R2	3/4.1.2.1	Boration Systems - Flow Path - Shutdown	TRM	§50.59
3.1 R3	3/4.1.2.2	Boration Systems - Flow Path - Operating	TRM	§50.59
3.1 R4	3/4.1.2.3	Charging Pump - Shutdown	TRM	§50.59
3.1 R5	3/4.1.2.4	Charging Pumps - Operating	TRM	§50.59
3.1 R6	Not used.			
3.1 R7	Not used.			

(By) - Byron specific  
(Bw) - Braidwood specific

**Table R - Relocated CTS**

Discussion of Change	Relocated CTS	Description of Relocated CTS	New Location	Control Process
3.1 R8	3.1.3.3, 3/4.10.5	Position Indication System - Shutdown	TRM	§50.59
3.1 LA15 (meets criteria of Relocated CTS)	3/4.1.2.5, 3/4.1.2.6	Borated Water Sources - Shutdown Borated Water Sources - Operating	TRM	§50.59
CTS Section 3/4.2, Power Distribution Limits				
None				
CTS Section 3/4.3, Instrumentation				
3.3 R1	3/4.3.3.2	Movable Incore Detectors	TRM	§50.59
3.3 R2	3/4.3.3.3	Seismic Instrumentation	TRM	§50.59
3.3 R3	3/4.3.3.4	Meteorological Instrumentation	TRM	§50.59
3.3 R4	3/4.3.3.8	Loose-Part Detection System	TRM	§50.59
3.3 R5	3/4.3.3.11	High Energy Line Break Isolation Sensors	TRM	§50.59
3.3 R6	3/4.3.4	Turbine Overspeed Protection	TRM	§50.59
3.3 R7	3/4.3.3.10	Explosive Gas Monitoring Instrumentation	TRM	§50.59
CTS Section 3/4.4, Reactor Coolant System				
3.4 R1	3/4.4.2.1	Safety Valves - Shutdown	TRM	§50.59

(By) - Byron specific  
(Bw) - Braidwood specific

Table R - Relocated CTS

Discussion of Change	Relocated CTS	Description of Relocated CTS	New Location	Control Process
3.4 R2	3/4.4.7	Chemistry	TRM	§50.59
3.4 R3	3/4.4.9.2	Pressurizer Pressure/Temperature Limits	TRM	§50.59
3.4 R4	3/4.4.10	Structural Integrity (except requirements for reactor coolant pump flywheel)	TRM	§50.59
3.4 R5	3/4.4.11	RCS Vents	TRM	§50.59
CTS Section 3/4.5, Emergency Core Cooling Systems				
3.5 R1	3.5.4.2 4.5.4.2.2	ECCS Subsystems - T <sub>avg</sub> Less Than or Equal to 200°F with Pressurizer Level Less Than or Equal to 5 percent (Level 409.5') - during Mode 5 or 6 with pressurizer level ≤ 5 percent, requirements for either a safety injection pump and flow path or a gravity feed alignment from the RWST with the RCS outlet (hot side) vented.	TRM	§50.59
CTS Section 3/4.6, Containment Systems				
None				
CTS Section 3/4.7, Plant Systems				
3.7 R1	3/4.7.2	Steam Generator Pressure/Temperature Limitation	TRM	§50.59
3.7 R2	Not used.			
3.7 R3	3/4.7.9	Sealed Source Contamination	TRM	§50.59
3.7 R4	3/4.7.12	Area Temperature Monitoring	TRM	§50.59
3.7 R5	3/4.7.8	Snubbers	TRM	§50.59

(By) - Byron specific  
(Bw) - Braidwood specific



**Table R - Relocated CTS**

Discussion of Change	Relocated CTS	Description of Relocated CTS	New Location	Control Process
CTS Section 3/4.8, Electrical Power Systems				
3.8 R1	3/4.8.4.1	Containment Penetration Conductor Overcurrent Protective Devices	TRM	§50.59
3.8 R2	3/4.8.4.2	Motor Operated Valves Thermal Overload Protection Devices	TRM	§50.59
CTS Section 3/4.9, Refueling Operations				
3.9 R1	Not used.			
3.9 R2	3/4.9.5	Communications	TRM	§50.59
3.9 R3	3/4.9.6	Refueling Machine	TRM	§50.59
3.9 R4	3/4.9.7	Crane Travel - Spent Fuel Storage Facility	TRM	§50.59
3.9 LA6 (meets criteria of Relocated CTS)	3/4.9.3	Decay Time	TRM	§50.59
CTS Section 5.0, Design Features				
Not applicable				
CTS Section 6.0, Administrative Controls				
Not applicable				

(By) - Byron specific  
(Bw) - Braidwood specific