L-2013-024
10 CFR 50.90

MAR 0 8 2013

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, D.C. 20555-0001

Re: Turkey Point Unit 3
Docket No. 50-250
License Amendment Request No. 225 Regarding One-Time Extension
for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d

References:

(1) J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – "Issuance of Amendments Regarding Alternative Source Term (TAC Nos. ME1624 and ME1625)," Accession No. ML110800666, June 23, 2011.

(2) J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – "Issuance of Amendments Regarding Extended Power Uprate (TAC Nos. ME4907 and ME4908)," Accession No. ML11293A365, June 15, 2012.

On June 23, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 244 and 240 to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Plant, Unit Nos. 3 and 4, respectively, with supporting Safety Evaluation Report (SER) regarding the Alternative Source Term (AST) [Reference 1].

On June 15, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 249 and 245 to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Plant, Unit Nos. 3 and 4, respectively, with supporting Safety Evaluation Report (SER) regarding the Extended Power Uprate (EPU) [Reference 2].

Both of these amendments for Unit 3 were implemented during the Cycle 26 refueling outage. The refueling outage for Unit 3 Cycle 27 is scheduled to start on or about January 6, 2014. However, due to the longer than expected EPU refueling outage and the associated power ascension testing, it is necessary to push out the scheduled refueling outage to permit the station to optimize fuel burnup for the current cycle. Initially a total of twenty-three (23) Technical Specification (TS) surveillances were identified that would reach the end of their specified frequency intervals including grace period between mid-January and mid-March 2014. These surveillances were conducted early in the Unit 3 Cycle 26 refueling outage before substantial slippage in the outage schedule occurred and before the protracted power ascension testing that followed it. Two successive forced outages in late February 2013 resulted in further delays but at the same time provided an opportunity to re-perform all but one of these surveillances which could not be performed without unnecessary risk under the plant conditions at the time. Therefore, it is necessary to extend the performance interval for the one remaining surveillance by two months to facilitate fuel optimization. Accordingly, pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests that Renewed Facility Operating License DPR-31for Turkey Point Unit 3 be amended to add a license condition for a one-time (temporary) extension for TS Surveillance Requirement 4.5.1.1.d involving an operability demonstration of the Emergency Core Cooling System (ECCS) accumulator check valves in order to account for effects of rescheduling the Unit 3 Cycle 27 refueling outage from January 2014 to March 2014.

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A description of the proposed license condition for Unit 3 with supporting justification and a No Significant Hazards Determination and Environmental Consideration are provided in the Enclosure to this letter.

The Turkey Point Plant Nuclear Safety Committee has reviewed the proposed license amendment. The proposed license amendment has been evaluated in accordance with 10 CFR 50.91(a)(1), using the criteria in 10 CFR 50.92(c). FPL has determined that the proposed license amendment does not involve a significant hazards consideration.

FPL has determined that the proposed amendment involves no significant increase in the amounts or types of any effluents that may be released offsite, and no significant increase in individual or cumulative occupational radiation exposure. Therefore, FPL has concluded that the proposed amendment meets the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with the issuance of the amendment.

This letter contains no new commitments and no revisions to existing commitments.

The NRC has approved surveillance extensions for delayed refueling outages at other plants, including River Bend in 2009, Kewaunee in 2006, and Cooper in 2004. The specific surveillance identified above for Turkey Point Unit 3 was performed between late February and mid-April 2012 and has a due date (including the 25% grace period allowance) of January 20, 2014 while the Unit 3 Cycle 27 refueling outage is currently scheduled to begin on January 6, 2014. Therefore, FPL requests the approval of the proposed amendment by October 20, 2013 to allow rescheduling of the outage and avoid a unit shutdown to perform the cited surveillance. Once approved, the amendment will be implemented when the unit is in the appropriate configuration, i.e., Mode 6. Although this request is neither exigent nor emergency, prompt staff review is requested.

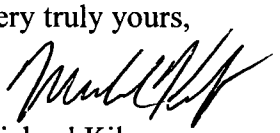
In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the State Designee of Florida.

Should you have any questions regarding this submittal, please contact Mr. Robert J. Tomonto, Licensing Manager, at (305) 246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 8, 2013.

Very truly yours,



Michael Kiley
Site Vice President
Turkey Point Nuclear Plant

Enclosure

cc: USNRC Regional Administrator, Region II
USNRC Project Manager, Turkey Point Nuclear Plant
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant
Ms. Cindy Becker, Florida Department of Health

Enclosure
Turkey Point Unit 3

License Amendment Request No. 225 Regarding One-Time Extension for Unit 3 Technical Specification Surveillance Requirement 4.5.1.1.d

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LICENSE AMENDMENT REQUEST NO. 225 REGARDING ONE-TIME EXTENSION FOR UNIT 3 TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 4.5.1.1.d

1.0 Purpose and Scope

Florida Power & Light Company (FPL) proposes to amend Renewed Facility Operating License DPR-31 for Turkey Point Unit 3 to add a new license condition for Unit 3 allowing a one-time extension of Technical Specification (TS) Surveillance Requirement (SR) 4.5.1.1.d that is normally performed on an eighteen month interval during scheduled refueling outages. The requested surveillance extension will allow two more months than the currently specified refueling outage interval of eighteen months plus four and one half months grace period and facilitate the plant's ability to optimize fuel burnup during the current Unit 3 operating cycle (Cycle 26). The extension is needed as a result of a longer than expected Extended Power Uprate (EPU) refueling outage and associated power ascension test program, and two recent forced unit outages.

2.0 Background Information

On June 23, 2011, the U.S. Nuclear Regulatory Commission (NRC) issued Amendment Nos. 244 and 240 to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Plant, Unit Nos. 3 and 4, respectively, with supporting Safety Evaluation Report (SER) regarding the Alternative Source Term (AST) [Reference 1].

On June 15, 2012, the NRC issued Amendment Nos. 249 and 245 to Renewed Facility Operating License Nos. DPR-31 and DPR-41 for the Turkey Point Nuclear Plant, Unit Nos. 3 and 4, respectively, with supporting SER regarding the EPU [Reference 2].

Both of these amendments for Unit 3 were implemented during the Cycle 26 refueling outage. The Unit 3 Cycle 27 refueling outage is scheduled to start on or about January 6, 2014. However, due to the longer than expected EPU refueling outage and the associated power ascension testing, it has become necessary to push out the scheduled refueling outage to permit the station to optimize fuel burnup for the current cycle. Initially, a total of twenty-three (23) TS surveillances were identified that would reach the end of their specified frequency intervals including grace period between mid-January and mid-March 2014. These surveillances were conducted early in the Unit 3 Cycle 26 refueling outage before substantial slippage in the outage schedule occurred and before the protracted power ascension testing that followed it. Two successive forced outages in late February 2013 resulted in further delay but at the same time provided the opportunity to re-perform all but one of these surveillances which could not be performed without unnecessary risk under the plant conditions at the time. Thus, it is necessary to extend the performance interval for the one remaining surveillance by two months to facilitate fuel optimization. Accordingly, pursuant to 10 CFR 50.90, FPL requests that Renewed Facility Operating License DPR-31for Turkey Point Unit 3 be amended to add a license condition for a one-time extension for TS SR 4.5.1.1.d involving an operability demonstration of the Emergency Core Cooling System (ECCS) accumulator check valves in order to account for effects of rescheduling the Unit 3 Cycle 27 refueling outage from January 2014 to March 2014.

3.0 Description of Proposed Change

The proposed change involves the addition of a new Unit 3 License Condition 3.M regarding a One-Time Extension of the Surveillance Interval Requirement for TS 4.5.1.1.d. In order to provide a more specific description of the proposed change, a markup of the Unit 3 Operating License (OL) is attached and a description of the change with appropriate justification is provided below. Also, attached is an Information Only copy of the associated TS 4.5.1.1.d.

3.1 Changes to the Turkey Point Technical Specifications

None

3.2 Changes to the Turkey Point Renewed Operating License DPR-31

Current License Condition

None

Proposed License Condition

3.M One-Time Surveillance Interval Extension

During Unit 3 Cycle 26, in lieu of the Technical Specification specified 18 month refueling frequency and 4.5 month grace period allowance, the maximum allowed surveillance test interval for Surveillance Requirement 4.5.1.1.d will be extended to no more than 24.5 months.

Basis for the Change:

TS 3.5.1 requires operability of the ECCS accumulators in Modes 1, 2, & 3 when pressurizer pressure is above 1000 psig. SR 4.5.1.1.d states that "At least once per 18 months, each accumulator check valve shall be checked for operability." The surveillance test of the Safety Injection Accumulator and RCS Cold Leg Check Valves 3-875A through 3-875F was last completed on March 4, 2012 and it is due again by January 20, 2014. This includes the 25% grace period allowance. As discussed above, FPL needs to reschedule the Unit 3 Cycle 27 refueling outage to allow the station to optimize fuel burnup for the current operating cycle. Therefore, an extension of the refueling frequency interval for this surveillance is required to delay its performance two months and avoid a Unit 3 shutdown in January 2014.

The accumulators provide a passive means for rapid injection of borated water for mitigation of accidents which result in a rapid depressurization of the Reactor Coolant System (RCS). The accumulators also augment the Safety Injection System (SIS) delivery of borated water to the RCS during some accidents. The accumulator subsystem includes the accumulators and their discharge paths with check valves (3-875D, 3-875E, and 3-875F) up to but not including the first check valve off the RCS cold legs (3-875A, 3-875B, and 3-875C).

3-875A, 3-875B, and 3-875C are Cold Leg Injection Check Valves and have the following safety-related functions:

1. Shall remain closed during normal plant operation when the SI Cold Leg injection header pressure is less than RCS Cold Leg pressure to prevent backleakage to the SI system. Check valve closure is necessary:
   - maintain the reactor coolant pressure boundary (RCPB)
   - to prevent possible system damage from overpressurization
   - to prevent contaminating the SI system and the RWST
2. Shall automatically open to allow SI flow in the forward direction during SI operation when the SI System pressure is greater than RCS Cold Leg pressure.
3. Shall passively maintain the SI system pressure boundary integrity.
4. Shall passively maintain the reactor coolant pressure boundary (RCPB).

3-875D, 3-875E, and 3-875F are SI Accumulator Check Valves and have the following safety-related functions:

1. Shall open to allow SI flow in the forward direction during SI operation when the SI System pressure is greater than RCS Cold Leg pressure
2. Shall passively maintain the SI system pressure boundary integrity.

They also have the following quality-related functions:

1. Shall remain closed during normal plant operation when the downstream header pressure is greater than accumulator pressure to prevent backleakage to the accumulator. This function is redundant to 3-875 A/B/C for backleakage from the RCS. Check valve closure is necessary:
   - to prevent possible dilution of accumulator boron concentration
   - to prevent possible overpressurization (from leakage in excess of relief capacity)
2. Shall close during the Post-LOCA Injection Phase when the downstream header pressure exceeds SI Accumulator pressure. Check valve closure is necessary:
   - to prevent diversion of essential safety injection flow out the accumulator relief valve
   - to prevent potential overpressurization of the accumulator from leakage in excess of relief capacity.

The operability of each accumulator ensures that a sufficient volume of borated water will be immediately forced into the reactor core through each of the cold legs in the event the RCS pressure falls below the pressure of the accumulators. This initial surge of water into the core provides the initial cooling mechanism during large RCS pipe ruptures. For an accumulator to be considered OPERABLE, the isolation valve must be fully open, power removed above 1000 psig, and the limits established in the surveillance requirements for contained volume, boron concentration, and nitrogen cover pressure must be met.

Although Unit 3 had two forced outages in February 2013, the accumulator discharge test for check valves 3-875A through 3-875F was not performed due to the unit configuration (Mode 5). The surveillance test procedure exercises each check valve pair by filling and pressurizing the associated safety injection accumulator while isolated from its RCS loop, then opening the associated accumulator motor operated valve (MOV-3-865A, B, and C). Check valve operation is verified by observing system parameters while monitoring the individual check valves via diagnostic technology. The surveillance procedure requires that testing of the check valves to be performed with the reactor head removed and the reactor cavity flooded in order to minimize the potential introduction of non-condensable gases (nitrogen) into the reactor coolant system. The decision to not perform the surveillance at this time and seek this extension was based on the following:

- The test is performed every refueling outage and a review of the test results for the last six Unit 3 outages indicate satisfactory test performance and no check valve failures.
- The proposed extension is only for a period of two months until the proposed schedule for Unit 3 Cycle 27 refueling outage begins.
- The test is normally performed with the reactor head removed and the reactor cavity filled. FPL's experience indicates that substantial quantities of nitrogen gas are released. With the reactor head removed, the gas bubbles to the cavity surface. With the reactor head installed, the gas would remain in the reactor coolant system, resulting in reactor head voids, and potentially resulting in cavitation and/or gas binding of residual heat removal (RHR) pumps. This is an unnecessary challenge to RHR cooling.

- Gas in the RHR system can result in inaccurate RHR system instrumentation indication, most notably associated with RHR flow indication. This would further challenge the operators' ability to ensure adequate core cooling.

Based on these points FPL concluded that the risk of performing this test with the reactor head installed was not justifiable and the extension request was a prudent alternative.

A markup of the OL change and an information copy of the associated TS are attached.

4.0 List of Commitments

None

5.0 Conclusion

The Cycle 26 refueling outage took longer than expected such that it is necessary to push out the scheduled Unit 3 Cycle 27 refueling outage to allow the station to optimize fuel burnup for the current cycle. Initially a total of twenty-three (23) TS surveillances were identified that would reach the end of their specified frequency intervals including grace period (i.e., drop-dead dates) between mid-January and mid-March 2014. These surveillances were conducted early in the Unit 3 Cycle 26 refueling outage before substantial slippage in the outage schedule occurred and before the protracted power ascension testing that followed it. Two successive forced outages in late February 2013 resulted in further delays but at the same time provided an opportunity to re-perform all but one (1) of these surveillances which could not be performed without unnecessary risk under the plant conditions at the time. Unless an extension is granted for this remaining surveillance, Unit 3 will have to shut down prematurely in order to comply with the current surveillance schedule. Therefore, FPL is requesting to add a license condition for a one-time extension of SR 4.5.1.1.d involving the operability demonstration of the ECCS accumulator check valves in order to account for the effects of rescheduling the Unit 3 Cycle 27 refueling outage from January to March 2014.

Review of the performance histories for the ECCS accumulator check valves for the past six refueling outages indicates that there have not been any test failures; therefore, the extension of the surveillance test for two months is expected to have no adverse impact on the performance of these valves.

6.0 No Significant Hazards Determination

The Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazard if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

The proposed license amendment to Renewed Facility Operating License DPR-31 for Turkey Point Unit 3 will add new license condition 3.M to provide for a one-time two month extension of SR 4.5.1.1.d involving an operability demonstration of the ECCS accumulator check valves to account for the effects of rescheduling the Unit 3 Cycle 27 refueling outage from early January 2014 to March 2014.

FPL has reviewed this proposed license amendment and determined that its adoption would not involve a significant hazards consideration.

The basis for this determination is as follows:

The proposed amendment does not involve a significant hazards consideration for the following reasons:

1. **Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

   No. The requested action is a one-time extension to the performance interval of one TS surveillance requirement. The performance of the surveillance, or the failure to perform the surveillance, is not a precursor to an accident. Performing the surveillance or failing to perform the surveillances does not affect the probability of an accident. Therefore, the proposed delays in performance of the surveillance requirement in this amendment request does not increase the probability of an accident previously evaluated.

   A delay in performing the surveillance does not result in a system being unable to perform its required function. In the case of this one-time extension request, the relatively short period of additional time that the system and components will be in service before the next performance of the surveillance will not affect the ability of the system to operate as designed noting that no time-dependent failure modes have been identified for the subject check valves

   The ECCS accumulators will remain capable of performing their required safety function. No new failure modes have been introduced because of this action and the consequences remain consistent with previously evaluated accidents. Therefore, the proposed delay in the performance of the surveillance requirement in this amendment request does not involve a significant increase in the consequences of an accident.

   Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

   No. The proposed amendment does not involve a physical alteration of any system, structure, or component (SSC), or a change in the way any SSC is operated. The proposed amendment does not involve operation of any SSCs in a manner or configuration different from those previously recognized or evaluated. The subject check valves do not have any time-dependent failure modes and no new failure mechanisms will be introduced by the one-time surveillance extension being requested.

   Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does the proposed amendment involve a significant reduction in the margin of safety?**

   No. The proposed amendment is a one-time extension of the performance interval for one TS surveillance requirement. Extending the surveillance requirement does not involve a modification of any TS Limiting Condition for Operation. Extending the surveillance frequency does not involve a change to any limit on accident consequences specified in the license or regulations. Extending the surveillance frequency does not involve a change to how accidents are mitigated or a significant increase in the consequences of an accident. Extending the surveillance frequency does not involve a change in a methodology used to evaluate consequences of an accident. Extending the surveillance frequency does not involve a change in any operating procedure or process.

   The components involved in this request have exhibited reliable operation based on the results of past 18-month surveillance tests over the last six refueling outages. Based on the limited additional period of time that the systems and components will be in service before the surveillances are next performed, as well as the operating experience that indicates this surveillance has been successful when performed, it is reasonable to conclude that any margin of safety associated with the surveillance requirement will not be affected by the requested extension.

   Therefore, the proposed amendment does not involve a significant reduction in the margin of safety.

Based on the above discussion, FPL has determined that the proposed amendment does not involve a significant hazards consideration.

7.0 Environmental Consideration

10 CFR 51.22(c)(9) provides criteria for and identification of licensing and regulatory actions eligible for categorical exclusion from performing an environmental assessment. A proposed amendment of an operating license for a facility requires no environmental assessment, if the operation of the facility in accordance with the proposed amendment does not: (1) involve a significant hazards consideration, (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and (3) result in a significant increase in individual or cumulative occupational radiation exposure. FPL has reviewed this license amendment request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment. The basis for this determination follows.

Basis

This change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) for the following reasons:

1. As demonstrated in the 10 CFR 50.92 evaluation, the proposed amendment does not involve a significant hazards consideration.
2. The proposed amendment does not result in a significant change in the types or increase in the amounts of any effluents that may be released offsite. The proposed amendment does not change or modify the design or operation of any plant systems, structures, or components. The proposed amendment does not affect the amount or types of gaseous, liquid, or solid waste generated onsite. The proposed amendment does not directly or indirectly affect effluent discharges.
3. The proposed amendment does not result in a significant increase in individual or cumulative occupational radiation exposure. The proposed amendment does not change or modify the design or operation of any plant systems, structures, or components. The proposed amendment does not directly or indirectly affect the radiological source terms.

8.0 Summary of Results

The Cycle 26 refueling outage took longer than expected such that it is necessary to push out the scheduled Unit 3 Cycle 27 refueling outage to permit the station to optimize fuel burnup for the current cycle. Initially a total of twenty-three (23) TS surveillances were identified that would reach the end of their specified frequency intervals including grace period (i.e., drop-dead dates) between mid-January and mid-March 2014. These surveillances were conducted early in the Unit 3 Cycle 26 refueling outage before substantial slippage in the outage schedule occurred and before the protracted power ascension testing that followed it. Two successive forced outages in late February 2013 resulted in further delay but at the same time provided an opportunity to re-perform all but one (1) of these surveillances which could not be performed without unnecessary risk under the plant conditions at the time. Unless an extension is granted for this remaining surveillance, Unit 3 will have to shut down prematurely in order to comply with the surveillance schedule. Therefore, FPL is requesting to add a license condition for a one-time extension of SR 4.5.1.1.d involving the operability demonstration of the ECCS accumulator check valves in order to account for the effects of rescheduling the Unit 3 Cycle 27 refueling outage from January 2014 to March 2014.

Review of the performance histories for the ECCS accumulator check valves for the past six refueling outages indicates that there have not been any test failures; therefore, the extension of the surveillance test for two months is expected to have no adverse impact on the performance of these valves.

Based on the above discussion, FPL has determined that the proposed amendment does not involve a significant hazards consideration and does not involve a significant increase in the amounts or types of any effluents that may be released offsite or a significant increase in individual or cumulative occupational radiation exposure such that an environmental impact statement or environmental assessment is not required.

9.0 References

1. J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – "Issuance of Amendments Regarding Alternative Source Term (TAC Nos. ME1624 and ME1625)," Accession No. ML110800666, June 23, 2011.
2. J. Paige (NRC) to M. Nazar (FPL), "Turkey Point Units 3 and 4 – "Issuance of Amendments Regarding Extended Power Uprate (TAC Nos. ME4907 and ME4908)," Accession No. ML11293A365, June 15, 2012.

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K. PAD TCD Safety Analyses

1. PAD 4.0 TCD has been specifically approved for use for the Turkey Point licensing basis analyses. Upon NRC's approval of a revised generic version of PAD that accounts for Thermal Conductivity Degradation (TCD), FPL will within six months:

   a. Demonstrate that PAD 4.0 TCD remains conservatively bounding in licensing basis analyses when compared to the new generically approved version of PAD w/TCD, or
   b. Provide a schedule for the re-analysis using the new generically approved version of PAD w/TCD for any of the affected licensing basis analyses.

L. Burnable Absorbers in Spent Fuel Pool

1. With respect to Technical Specification 5.5.1.3, FPL shall not credit any burnable absorber other than Integral Fuel Burnable Absorber (IFBA) rods for the storage of fuel assemblies in the Region I spent fuel racks.

4. This renewed license is effective as of the date of issuance, and shall expire at midnight July 19, 2032.

FOR THE NUCLEAR REGULATORY COMMISSION

Signed by
Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Attachments:
Appendix A – Technical Specifications for Unit 3
Appendix B – Environmental Protection Plan

Date of Issuance: June 6, 2002

M One-Time Surveillance Interval Extension
During Unit 3 Cycle 26, in lieu of the Technical Specification specified 18 month refueling frequency and 4.5 month grace period allowance, the maximum allowed surveillance test interval for Surveillance Requirement 4.5.1.1.d will be extended to no more than 24.5 months.

For Information Only

3/4.5 EMERGENCY CORE COOLING SYSTEMS

3/4.5.1 ACCUMULATORS

LIMITING CONDITION FOR OPERATION

3.5.1 Each Reactor Coolant System (RCS) accumulator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3*.

ACTION:

a. With one accumulator inoperable, except as a result of boron concentration not being within limits, restore the inoperable accumulator to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

b. With one accumulator inoperable due to the boron concentration not being within the limits, restore boron concentration back to the required limits within 72 hours, or be in at least HOT STANDBY within 6 hours and reduce pressurizer pressure to less than 1000 psig within the following 6 hours.

SURVEILLANCE REQUIREMENTS

4.5.1.1 Each accumulator shall be demonstrated OPERABLE:

a. At least once per 12 hours by:

1) Verifying the borated water volume in each accumulator is between 6520 and 6820 gallons, and

2) Verifying that the nitrogen cover pressure in each accumulator is between 600 and 675 psig, and

3) Verifying that each accumulator isolation valve is open by control room indication (power may be restored to the valve operator to perform this surveillance if redundant indicator is inoperable).

*Pressurizer pressure above 1000 psig.

For Information Only

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 31 days and within 6 hours after each solution volume increase of greater than or equal to 1% of tank volume by verifying the boron concentration of the solution in the water-filled accumulator is between 2300 and 2600 ppm;

c. At least once per 31 days, when the RCS pressure is above 1000 psig, by verifying that the power to the isolation valve operator is disconnected by a locked open breaker.

d. At least once per 18 months, each accumulator check valve shall be checked for operability.