

ATTACHMENT A
EXISTING SPECIFICATION - UNIT 2

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ELECTRICAL POWER SYSTEMS

ACTION (Continued)

2. When in MODE 1, 2, or 3, the steam-driven auxiliary feed pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within one hour and at least once per 8 hours thereafter, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability.
 1. If transformers 3XR2 and 3XR1 are the second source; the following buses are required:
 - 4160 volt Emergency Bus #3A04
 - 4160 volt Emergency Bus #3A06
 - 480 volt Emergency Bus #3B04
 - 480 volt Emergency Bus #3B06
 - 125 volt DC Bus #3D1
 - 125 volt DC Bus #3D2 or,
 2. If transformer 2Xu1 is the second source,* visually verify that the disconnect link to the Unit 2 turbine generator is removed.

*To be used as the second source of off-site power only during initial low power PHYSICS TESTS.

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generator as a source of emergency power, are also OPERABLE, and that the steam-driven auxiliary feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss of offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out-of-service for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements to verify OPERABILITY of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system allows for one of two alternatives. The connection can be made by back-feeding from Unit 3. Alternatively, the Unit 2 auxiliary transformer also may provide an alternate means of operation during low power PHYSICS TESTS. With the Unit 2 isolated-phase bus links removed, if preferred power from the Unit 2 reserve auxiliary transformer is lost, the 4.16 kV feeder circuit breaker can be inserted into the auxiliary transformer position to reestablish power to the Class 1E bus. Breaker controls for this connection,

ELECTRIC POWER SYSTEMS

BASES

A.C. SOURCES, D.C. SOURCES AND ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

as well as operation of loss of voltage logic, is the same as for the primary connection using the reserve auxiliary transformer, with the exception of no transfer to the companion unit.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, and 1.137, "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979. Reg. Guide 1.137 recommends testing of fuel oil samples in accordance with ASTM-D270-1975. However, ASTM-D270-1965 was reverified in 1975 rather than re-issued. The reverified 1965 standard is therefore the appropriate standard to be used.

Additionally, Regulatory Guide 1.9 allows loading of the diesel generator to its 2000 hour rating in an accident situation. The full load, continuous operation rating for each diesel generator is 4700 kw, while the calculated accident loading is 4000 kw. No 2000 hour loading has been specified by the diesel generator manufacturer and, as a result the full loading rating of 4700 kw is conservatively established as the 2000 hour rating. Diesel frequency droop restrictions are established due to HPSI flow rate considerations.

The Surveillance Requirement for demonstrating the OPERABILITY of the Station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978, and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage onfloat charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and .015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than .020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than .010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.

ATTACHMENT B

EXISTING SPECIFICATION - UNIT 3

ELECTRICAL POWER SYSTEMS

ACTION (Continued)

2. When in MODE 1, 2, or 3, the steam-driven auxiliary feed pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 1 hour and at least once per 8 hours thereafter, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability.
 1. If transformers 2XR2 and 2XR1 are the second source, the following buses are required:
 - 4160 volt Emergency Bus #2A04
 - 4160 volt Emergency Bus #2A06
 - 480 volt Emergency Bus #2B04
 - 480 volt Emergency Bus #2B06
 - 125 volt DC Bus #2D1
 - 125 volt DC Bus #2D2 or,
 2. If transformer 3Xu1 is the second source,* visually verify that the disconnect link to the Unit 3 turbine generator is removed.

*To be used as the second source of offsite power only during initial low power PHYSICS TESTS.

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3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety-related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criterion 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources is consistent with the initial condition assumptions of the safety analyses and is based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generator as a source of emergency power, are also OPERABLE, and that the steam-driven auxiliary feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss of offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out of service for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements to verify OPERABILITY of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system allows for one of two alternatives. The connection can be made by back-feeding from Unit 3. Alternatively, the Unit 2 auxiliary transformer also may provide an alternate means of operation during low power PHYSICS TESTS. With the Unit 2 isolated-phase bus links removed, if preferred power from the Unit 2 reserve auxiliary transformer is lost, the 4.16 kV feeder circuit breaker can be inserted into the auxiliary transformer position to reestablish power to the Class 1E bus. Breaker controls for this connection,

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ELECTRIC POWER SYSTEMS

BASES

A.C. SOURCES, D.C. SOURCES AND ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

as well as operation of loss of voltage logic, is the same as for the primary connection using the reserve auxiliary transformer, with the exception of no transfer to the companion unit.

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, and 1.137, "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979. Regulatory Guide 1.137 recommends testing of fuel oil samples in accordance with ASTM-D270-1975. However, ASTM-D270-1965 was reverified in 1975 rather than re-issued. The reverified 1965 standard is therefore the appropriate standard to be used.

Additionally, Regulatory Guide 1.9 allows loading of the diesel generator to its 2000 hour rating in an accident situation. The full load, continuous operation rating for each diesel generator is 4700 kw, while the calculated accident loading is 4000 kw. No 2000 hour loading has been specified by the diesel generator manufacturer and, as a result the full loading rating of 4700 kw is conservatively established as the 2000 hour rating. Diesel frequency droop restrictions are established due to HPSI flow rate considerations.

The Surveillance Requirement for demonstrating the OPERABILITY of the Station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978, and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage onfloat charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and .015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than .020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than .010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.

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ATTACHMENT C

PROPOSED SPECIFICATION - UNIT 2

ELECTRICAL POWER SYSTEMS
ACTION (Continued)

2. When in MODE 1, 2, or 3, the steam-driven auxiliary feed pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within one hour and at least once per 8 hours thereafter, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability.

If tie breakers 3A0416 or 3A0603 are used to provide the second source of power, the following busses are required.

for 3A0416	for 3A0603
3A04	3A06
3B04	3B06
3D1	3D2

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generator as a source of emergency power, are also OPERABLE, and that the steam-driven auxiliary feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss of offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out-of-service for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements verify the OPERABILITY of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system. Two independent circuits are required in Modes 1 through 4. One source of power is supplied from Unit 2 itself and is normally provided through the Reserve Auxiliary Transformers (2XR1 and 2XR2). If the Unit 2 main generator iso phase bus links are removed, then the Unit Auxiliary Transformer 2XU1 can be used in place of 2XR1 and/or 2XR2. The second source of power is provided through the Unit 3 Reserve Auxiliary Transformers (3XR1 and 3XR2) and/or, with the Unit 3 generator iso phase bus links removed, the Unit 3 Unit Auxiliary Transformer (3XU1).

ELECTRIC POWER SYSTEMS

BASES

A.C. SOURCES, D.C. SOURCES AND ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, and 1.137, "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979. Reg. Guide 1.137 recommends testing of fuel oil samples in accordance with ASTM-D270-1975. However, ASTM-D270-1965 was reverified in 1975 rather than re-issued. The reverified 1965 standard is therefore the appropriate standard to be used.

Additionally, Regulatory Guide 1.9 allows loading of the diesel generator to its 2000 hour rating in an accident situation. The full load, continuous operation rating for each diesel generator is 4700 kw, while the calculated accident loading is 4000 kw. No 2000 hour loading has been specified by the diesel generator manufacturer and, as a result the full loading rating of 4700 kw is conservatively established as the 2000 hour rating. Diesel frequency droop restrictions are established due to HPSI flow rate considerations.

The Surveillance Requirement for demonstrating the OPERABILITY of the Station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978, and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage onfloat charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and .015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than .020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than .010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.

ATTACHMENT D

PROPOSED SPECIFICATION - UNIT 3

ELECTRICAL POWER SYSTEMS
ACTION (Continued)

2. When in MODE 1, 2, or 3, the steam-driven auxiliary feed pump is OPERABLE.

If these conditions are not satisfied within 2 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With two of the above required offsite A.C. circuits inoperable, demonstrate the OPERABILITY of two diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within one hour and at least once per 8 hours thereafter, unless the diesel generators are already operating; restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- e. With two of the above required diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within one hour and at least once per 8 hours thereafter; restore at least one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two diesel generators to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments and indicated power availability.

If tie breakers 2A0417 or 2A0619 are used to provide the second source of power, the following busses are required.

for 2A0417	for 2A0619
2A04	2A06
2B04	2B06
2D1	2D2

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1, 3/4.8.2, and 3/4.8.3 A.C. SOURCES, D.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for 1) the safe shutdown of the facility and 2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix "A" to 10 CFR 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the safety analyses and are based upon maintaining at least one redundant set of onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of the other onsite A.C. source. The A.C. and D.C. source allowable out-of-service times are based on Regulatory Guide 1.93, "Availability of Electrical Power Sources," December 1974. When one diesel generator is inoperable, there is an additional ACTION requirement to verify that all required systems, subsystems, trains, components and devices, that depend on the remaining OPERABLE diesel generator as a source of emergency power, are also OPERABLE, and that the steam-driven auxiliary feedwater pump is OPERABLE. This requirement is intended to provide assurance that a loss of offsite power event will not result in a complete loss of safety function of critical systems during the period one of the diesel generators is inoperable. The term verify as used in this context means to administratively check by examining logs or other information to determine if certain components are out-of-service for maintenance or other reasons. It does not mean to perform the surveillance requirements needed to demonstrate the OPERABILITY of the component.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that 1) the facility can be maintained in the shutdown or refueling condition for extended time periods and 2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The Surveillance Requirements verify the OPERABILITY of the required independent circuits between the offsite transmission network and the onsite Class 1E distribution system. Two independent circuits are required in Modes 1 through 4. One source of power is supplied from Unit 3 itself and is normally provided through the Reserve Auxiliary Transformers (3XR1 and 3XR2). If the Unit 3 main generator iso phase bus links are removed, then the Unit Auxiliary Transformer 3XU1 can be used in place of 3XR1 and/or 3XR2. The second source of power is provided through the Unit 2 Reserve Auxiliary Transformers (2XR1 and 2XR2) and/or, with the Unit 2 generator iso-phase bus links removed, the Unit 2 Unit Auxiliary Transformer (2XU1).

ELECTRIC POWER SYSTEMS

BASES

A.C. SOURCES, D.C. SOURCES AND ONSITE POWER DISTRIBUTION SYSTEMS (Continued)

The Surveillance Requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guides 1.9 "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, and 1.108 "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977, and 1.137, "Fuel Oil Systems for Standby Diesel Generators," Revision 1, October 1979. Regulatory Guide 1.137 recommends testing of fuel oil samples in accordance with ASTM-D270-1975. However, ASTM-D270-1965 was reverified in 1975 rather than re-issued. The reverified 1965 standard is therefore the appropriate standard to be used.

Additionally, Regulatory Guide 1.9 allows loading of the diesel generator to its 2000 hour rating in an accident situation. The full load, continuous operation rating for each diesel generator is 4700 kw, while the calculated accident loading is 4000 kw. No 2000 hour loading has been specified by the diesel generator manufacturer and, as a result the full loading rating of 4700 kw is conservatively established as the 2000 hour rating. Diesel frequency droop restrictions are established due to HPSI flow rate considerations.

The Surveillance Requirement for demonstrating the OPERABILITY of the Station batteries are based on the recommendations of Regulatory Guide 1.129, "Maintenance Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants," February 1978, and IEEE Std 450-1980, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

Verifying average electrolyte temperature above the minimum for which the battery was sized, total battery terminal voltage onfloat charge, connection resistance values and the performance of battery service and discharge tests ensures the effectiveness of the charging system, the ability to handle high discharge rates and compares the battery capacity at that time with the rated capacity.

Table 4.8-2 specifies the normal limits for each designated pilot cell and each connected cell for electrolyte level, float voltage and specific gravity. The limits for the designated pilot cells float voltage and specific gravity, greater than 2.13 volts and .015 below the manufacturer's full charge specific gravity or a battery charger current that had stabilized at a low value, is characteristic of a charged cell with adequate capacity. The normal limits for each connected cell for float voltage and specific gravity, greater than 2.13 volts and not more than .020 below the manufacturer's full charge specific gravity with an average specific gravity of all the connected cells not more than .010 below the manufacturer's full charge specific gravity, ensures the OPERABILITY and capability of the battery.

DESCRIPTION OF PROPOSED CHANGES NPF-10-161 AND NPF-15-161
AND SAFETY ANALYSIS

This is a request to revise Sections 3/4.1.1.2 and Bases - Reactivity Control Systems - Shutdown Margin - Tavg Less Than or Equal to 200°F, 3.1.2.2 - Reactivity Control Systems - Flow Paths - Operating, 3.1.2.4 - Reactivity Control Systems - Charging Pumps - Operating, 3.1.2.6 - Reactivity Control Systems - Boric Acid Makeup Pumps - Operating, 3.1.2.8 - Reactivity Control Systems - Borated Water Sources - Operating, and 3/4.1.2 Bases - Boration Systems of the Technical Specifications for San Onofre Nuclear Generating Station Units 2 and 3.

Description

The proposed change revises Technical Specifications 3/4.1.1.2 and Bases - Reactivity Control Systems - Shutdown Margin - Tavg Less Than or Equal to 200°F, 3.1.2.2 - Reactivity Control Systems - Flow Paths - Operating, 3.1.2.4 - Reactivity Control Systems - Charging Pumps - Operating, 3.1.2.6 - Reactivity Control Systems - Boric Acid Makeup Pumps - Operating, 3.1.2.8 - Reactivity Control Systems - Borated Water Sources - Operating, and 3/4.1.2 Bases - Boration Systems, which require reactivity control system operability and specify the negative reactivity (shutdown margin) required to reach or maintain reactor subcriticality during each mode of facility operation. The above sections specify the shutdown margin required when the core average moderator temperature is less than or equal to 200°F (Mode 5). The proposed change increases the required shutdown margin under the above conditions from 2.0% to 3.0% delta K/K, consistent with the safety analysis associated with Cycle 2 operation. In addition, a new surveillance requirement is proposed which verifies that only one charging pump is operable in Mode 5 when the reactor coolant system is drained below the hot leg centerline, as assumed in the Cycle 2 safety analysis.

Section 3.1.1.2 specifies the shutdown margin required in Mode 5. The proposed change increases the Mode 5 requirement from 2.0% to 3.0% delta k/k. Sections 3.1.2.2, 3.1.2.4, 3.1.2.6, 3.1.2.8, B 3/4.1.1 and B 3/4.1.2 have been revised accordingly, to ensure compliance with the Mode 5 requirement. In addition, a new surveillance requirement is proposed for Section 4.1.1.2, which ensures that only one charging pump is operable in Mode 5 as assumed in the Cycle 2 safety analysis.

The requirement for a Limiting Condition for Operation governing the shutdown margin originates from 10 CFR Appendix A, General Design Criterion 26 - "Reactivity Control System Redundancy and Capability" (GDC26) as it relates to the reliable control of reactivity changes to assure that the specified fuel design limits are not exceeded during design basis accidents and anticipated operational occurrences. This is accomplished by ensuring that appropriate margin for malfunctions is accounted for. Specific criteria necessary to meet the relevant requirements of GDC26 are given in NUREG-0800, U.S. Nuclear Regulatory Commission Standard Review Plan (SRP) Section 15.4.6 - "Chemical and Volume Control System Malfunction that Results in a Decrease in Boron Concentration in the Reactor Coolant." The criteria of SRP 15.4.6 are used in

evaluating the safety analysis of the inadvertent boron dilution event. Analysis results are used in establishing the Mode 5 shutdown margin Technical Specification in a manner consistent with 10 CFR 50.36, which states that Technical Specifications are to be derived from the safety analyses and evaluations included in the safety analysis report, and amendments thereto.

Core performance analyses of the Cycle 2 reactor fuel management design show that the critical boron concentrations have increased due to the differences in core performance characteristics from Cycle 1. As a consequence, the minimum Mode 5 shutdown margin required during Cycle 2 has increased and constraints on the operability of charging pumps are required to verify assumptions used in the safety analysis. The Cycle 1 inadvertent boron dilution analyses demonstrated that greater than 60 minutes were available between the initiation of an unplanned moderator dilution event and the time of loss of shutdown margin. The Cycle 2 analysis, incorporating the proposed change discussed above, demonstrates that greater than 60 minutes remain available between initiation of an unplanned moderator dilution event and the time of loss of shutdown margin. In both cycles, the operator will be alerted to this event with a minimum of 15 minutes remaining before criticality, by the alarm on the startup channel nuclear instrumentation, as required by SRP 15.4.6. Therefore, the results of the Cycle 2 analyses show no significant increase in the probability or consequences of an accident previously evaluated, nor is there any significant reduction in a margin of safety.

Existing Technical Specifications

Unit 2 - See Attachment A
Unit 3 - See Attachment B

Proposed Technical Specifications

Units 2 and 3 - See Attachment C

Safety Analysis

The proposed change discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident perviously evaluated?

Response: No

The proposed change in shutdown margin of from 2% to 3% delta k/k and restriction on the operability of the charging pumps in Mode 5, preclude the possibility of an increase in the probability or consequences of a CVCS malfunction (inadvertent boron dilution event). The proposed change ensures that the accident analysis acceptance criteria, as described in Section 15.4.6 of the SRP, are met.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated.

Response: No

The proposed change involves an increase in the shutdown margin from 2% to 3% delta k/k, and does not require a change in the accident analysis methodology, as discussed in Chapter 15 of the FSAR. Similarly, the proposed change imposes a limit on the operability of the charging pumps in Mode 5 and thereby constitutes an additional restriction or limitation not presently included in the Technical Specifications. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

Operation of the facility in accordance with this proposed change does not involve a significant reduction in a margin of safety, as the change in shutdown margin from 2% to 3% delta k/k and the restriction imposed on the operability of the charging pumps in Mode 5 will ensure that following a CVCS malfunction (inadvertent boron dilution event), the consequences of the transient are well within the analysis acceptance criteria as discussed in Section 15.4.6 of the SRP.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists, by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (iii) relates to a change resulting from a nuclear reactor core reloading, where no fuel assemblies are significantly different from those found previously acceptable to the NRC for a previous core at the facility in question; assuming that no significant changes are made to the acceptance criteria for the technical specifications, that the analytical methods used to demonstrate conformance with the technical specifications and regulations are not significantly changed, and that NRC has previously found such methods acceptable. The proposed change is similar to Example (iii) in that increasing the shutdown margin is a routine revision of technical values resulting from reactor fuel reloading. In addition, Example (ii) of (48 FR 14870) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications; for example, a more stringent surveillance requirement. The proposed change to Section 4.1.1.2 is similar to Example (ii) in that a more stringent requirement is added for the operator to verify at least once per 24 hours that at least two charging pumps are inoperable when the Reactor Coolant System is drained below the hot leg centerline in Mode 5.

Safety and Significant Hazards Determination

Based on the above discussion, the proposed change does not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

SB:2339F

ATTACHMENT A

REACTIVITY CONTROL SYSTEMS

SHUTDOWN MARGIN - T_{avg} LESS THAN OR EQUAL TO 200°F

LIMITING CONDITION FOR OPERATION

3.1.1.2 The SHUTDOWN MARGIN shall be greater than or equal to 2.0% delta k/k.

APPLICABILITY: MODE 5.

ACTION:

With the SHUTDOWN MARGIN less than 2.0% delta k/k, immediately initiate and continue boration at greater than or equal to 40 gpm of a solution containing greater than or equal to 1720 ppm boron or equivalent until the required SHUTDOWN MARGIN is restored.

SURVEILLANCE REQUIREMENTS

4.1.1.2 The SHUTDOWN MARGIN shall be determined to be greater than or equal to 2.0% delta k/k:

- a. Within one hour after detection of an inoperable CEA(s) and at least once per 12 hours thereafter while the CEA(s) is inoperable. If the inoperable CEA is immovable or untrippable, the above required SHUTDOWN MARGIN shall be increased by an amount at least equal to the withdrawn worth of the immovable or untrippable CEA(s).
- b. At least once per 24 hours by consideration of the following factors:
 1. Reactor coolant system boron concentration,
 2. CEA position,
 3. Reactor coolant system average temperature,
 4. Fuel burnup based on gross thermal energy generation,
 5. Xenon concentration, and
 6. Samarium concentration.

3/4.1 REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1 BORATION CONTROL

3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that 1) the reactor can be made subcritical from all operating conditions, 2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and 3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS T_{avg} . The most restrictive condition occurs at EOL, with T_{avg} at no load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN of 5.15% delta k/k is required to control the reactivity transient. Accordingly, the SHUTDOWN MARGIN requirement is based upon this limiting condition and is consistent with FSAR safety analysis assumptions. With T_{avg} less than or equal to 200°F, the reactivity transients resulting from any postulated accident are minimal and a 2% delta k/k shutdown margin provides adequate protection.

3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT

The limitations on moderator temperature coefficient (MTC) are provided to ensure that the assumptions used in the accident and transient analysis remain valid through each fuel cycle. The surveillance requirements for measurement of the MTC during each fuel cycle are adequate to confirm the MTC value since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup. The confirmation that the measured MTC value is within its limit provides assurances that the coefficient will be maintained within acceptable values throughout each fuel cycle.

REACTIVITY CONTROL SYSTEMS

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two of the following boron injection flow paths and one associated heat tracing circuit shall be OPERABLE:

- a. Flow paths from one or both boric acid makeup tanks via
 1. The associated gravity feed connection(s) and/or
 2. The associated boric acid makeup pump(s)
via charging pump(s) to the RCSand/or
- b. The flow path from the refueling water storage tank via charging pump(s) to the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least $\Delta k/k$ at 200°F within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that the temperature of the heat traced portion of the flow path from the boric acid makeup tanks is above the temperature limit line shown on Figure 3.1-1.
- b. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. At least once per 18 months during shutdown by verifying that each automatic valve in the flow path actuates to its correct position on a SIAS test signal.
- d. At least once per 18 months by verifying that the flow path required by Specification 3.1.2.2.a delivers at least 40 gpm to the Reactor Coolant System.

REACTIVITY CONTROL SYSTEMS

CHARGING PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.4 At least two charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one charging pump OPERABLE, restore at least two charging pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F within the next 6 hours; restore at least two charging pumps to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.4 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORIC ACID MAKEUP PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 At least the boric acid makeup pump(s) in the boron injection flow path(s) required OPERABLE pursuant to Specification 3.1.2.2a shall be OPERABLE and capable of being powered from an OPERABLE emergency bus if the flow path through the boric acid pump(s) in Specification 3.1.2.2a is OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one boric acid makeup pump required for the boron injection flow path(s) pursuant to Specification 3.1.2.2a inoperable, restore the boric acid makeup pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup pump(s) to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.6 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES -- OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 Each of the following borated water sources shall be OPERABLE:

- a. At least one boric acid makeup tank and at least one associated heat tracing circuit with the contents of the tanks in accordance with Figure 3.1-1, and
- b. The refueling water storage tank with:
 1. A minimum contained borated water volume of 362,800 gallons above the ECCS suction connection,
 2. Between 1720 and 2300 ppm of boron, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the above required boric acid makeup tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 Each borated water sources shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration in the water,
 2. Verifying the contained borated water volume of the water source, and
 3. Verifying the boric acid makeup tank solution temperature.
- b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is less than 40°F or greater than 100°F.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 520°F. This limitation is required to ensure 1) the moderator temperature coefficient is within its analyzed temperature range, 2) the protective instrumentation is within its normal operating range, 3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and 4) the reactor pressure vessel is above its minimum RT_{NOT} temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid makeup pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 2.0% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires boric acid solution from the boric acid makeup tanks in the allowable concentrations and volumes of Specification 3.1.2.8 or 53,500 gallons of 1720 ppm borated water from the refueling water tank. However, for the purpose of consistency the minimum required volume of 362,800 gallons above ECCS suction connection in Specification 3.1.2.8 is identical to the more restrictive value of Specification 3.5.4.

With the RCS temperature below 200°F one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a 2% delta k/k SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 5465 gallons of 1720 ppm borated water from the refueling water tank or boric acid solution from the boric acid makeup tanks in accordance with the requirements of Specification 3.1.2.7.

ATTACHMENT B

REACTIVITY CONTROL SYSTEMS

SHUTDOWN MARGIN - T_{avg} LESS THAN OR EQUAL TO 200°F

LIMITING CONDITION FOR OPERATION

3.1.1.2 The SHUTDOWN MARGIN shall be greater than or equal to 2.0% delta k/k.

APPLICABILITY: MODE 5.

ACTION:

With the SHUTDOWN MARGIN less than 2.0% delta k/k, immediately initiate and continue boration at greater than or equal to 40 gpm of a solution containing greater than or equal to 1720 ppm boron or equivalent until the required SHUTDOWN MARGIN is restored.

SURVEILLANCE REQUIREMENTS

4.1.1.2 The SHUTDOWN MARGIN shall be determined to be greater than or equal to 2.0% delta k/k:

- a. Within one hour after detection of an inoperable CEA(s) and at least once per 12 hours thereafter while the CEA(s) is inoperable. If the inoperable CEA is immovable or untrippable, the above required SHUTDOWN MARGIN shall be increased by an amount at least equal to the withdrawn worth of the immovable or untrippable CEA(s).
- b. At least once per 24 hours by consideration of the following factors:
 1. Reactor coolant system boron concentration,
 2. CEA position,
 3. Reactor coolant system average temperature,
 4. Fuel burnup based on gross thermal energy generation,
 5. Xenon concentration, and
 6. Samarium concentration.

3/4.1 REACTIVITY CONTROL SYSTEMS

BASES:

3/4.1.1 BORATION CONTROL

3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that 1) the reactor can be made subcritical from all operating conditions, 2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and 3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS T_{avg} . The most restrictive condition occurs at EOL, with T_{avg} at no load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN of 5.15% delta k/k is required to control the reactivity transient. Accordingly, the SHUTDOWN MARGIN requirement is based upon this limiting condition and is consistent with FSAR safety analysis assumptions. With T_{avg} less than or equal to 200°F, the reactivity transients resulting from any postulated accident are minimal and a 2% delta k/k shutdown margin provides adequate protection.

3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT

The limitations on moderator temperature coefficient (MTC) are provided to ensure that the assumptions used in the accident and transient analysis remain valid through each fuel cycle. The surveillance requirements for measurement of the MTC during each fuel cycle are adequate to confirm the MTC value since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup. The confirmation that the measured MTC value is within its limit provides assurances that the coefficient will be maintained within acceptable values throughout each fuel cycle.

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REACTIVITY CONTROL SYSTEMS

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two of the following boron injection flow paths and one associated heat tracing circuit shall be OPERABLE:

a. Flow paths from one or both boric acid makeup tanks via

1. The associated gravity feed connection(s) and/or

2. The associated boric acid makeup pump(s)

via charging pump(s) to the RCS

and/or

b. The flow path from the refueling water storage tank via charging pump(s) to the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that the temperature of the heat traced portion of the flow path from the boric acid makeup tanks is above the temperature limit line shown on Figure 3.1-1.
- b. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. At least once per 18 months during shutdown by verifying that each automatic valve in the flow path actuates to its correct position on a SIAS test signal.
- d. At least once per 18 months by verifying that the flow path required by Specification 3.1.2.2.a delivers at least 40 gpm to the Reactor Coolant System.

REACTIVITY CONTROL SYSTEMS

CHARGING PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.4 At least two charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one charging pump OPERABLE, restore at least two charging pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F within the next 6 hours; restore at least two charging pumps to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.4 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORIC ACID MAKEUP PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 At least the boric acid makeup pump(s) in the boron injection flow path(s) required OPERABLE pursuant to Specification 3.1.2.2a shall be OPERABLE and capable of being powered from an OPERABLE emergency bus if the flow path through the boric acid pump(s) in Specification 3.1.2.2a is OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one boric acid makeup pump required for the boron injection flow path(s) pursuant to Specification 3.1.2.2a inoperable, restore the boric acid makeup pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup pump(s) to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.6 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

- 3.1.2.8 Each of the following borated water sources shall be OPERABLE:
- a. At least one boric acid makeup tank and at least one associated heat tracing circuit with the contents of the tanks in accordance with Figure 3.1-1, and
 - b. The refueling water storage tank with:
 1. A minimum contained borated water volume of 362,800 gallons above the ECCS suction connection,
 2. Between 1720 and 2300 ppm of boron, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the above required boric acid makeup tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water tank inoperable, restore the tank to OPERABLE status within 1 hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

- 4.1.2.8 Each borated water source shall be demonstrated OPERABLE:
- a. At least once per 7 days by:
 1. Verifying the boron concentration in the water,
 2. Verifying the contained borated water volume of the water source, and
 3. Verifying the boric acid makeup tank solution temperature.
 - b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is less than 40°F or greater than 100°F.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 520°F. This limitation is required to ensure (1) the moderator temperature coefficient is within its analyzed temperature range, (2) the protective instrumentation is within its normal operating range, (3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and (4) the reactor pressure vessel is above its minimum RT_{NDT} temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include (1) borated water sources, (2) charging pumps, (3) separate flow paths, (4) boric acid makeup pumps, (5) associated heat tracing systems, and (6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 2.0% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires boric acid solution from the boric acid makeup tanks in the allowable concentrations and volumes of Specification 3.1.2.8 or 53,500 gallons of 1720 ppm borated water from the refueling water tank. However, for the purpose of consistency the minimum required volume of 362,800 gallons above ECCS suction connection in Specification 3.1.2.8 is identical to the more restrictive value of Specification 3.5.4.

With the RCS temperature below 200°F one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a 2% delta k/k SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 5465 gallons of 1720 ppm borated water from the refueling water tank or boric acid solution from the boric acid makeup tanks in accordance with the requirements of Specification 3.1.2.7.

ATTACHMENT C

REACTIVITY CONTROL SYSTEMS

SHUTDOWN MARGIN - T_{avg} LESS THAN OR EQUAL TO 200°F

LIMITING CONDITION FOR OPERATION

3.1.1.2 The SHUTDOWN MARGIN shall be greater than or equal to 3.0% delta k/k.

APPLICABILITY: MODE 5.

ACTION:

With the SHUTDOWN MARGIN less than 3.0% delta k/k, immediately initiate and continue boration at greater than or equal to 40 gpm of a solution containing greater than or equal to 1720 ppm boron or equivalent until the required SHUTDOWN MARGIN is restored.

SURVEILLANCE REQUIREMENTS

4.1.1.2 The SHUTDOWN MARGIN shall be determined to be greater than or equal to 3.0% delta k/k:

- a. Within one hour after detection of an inoperable CEA(s) and at least once per 12 hours thereafter while the CEA(s) is inoperable. If the inoperable CEA is immovable or untrippable, the above required SHUTDOWN MARGIN shall be increased by an amount at least equal to the withdrawn worth of the immovable or untrippable CEA(s).
- b. At least once per 24 hours by consideration of the following factors:
 1. Reactor coolant system boron concentration,
 2. CEA position,
 3. Reactor coolant system average temperature,
 4. Fuel burnup based on gross thermal energy generation,
 5. Xenon concentration, and
 6. Samarium concentration.
 7. Whenever the reactor coolant level is below the hot leg centerline, one and only one charging pump shall be operable; by verifying that power is removed from the remaining charging pumps.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 520°F. This limitation is required to ensure 1) the moderator temperature coefficient is within its analyzed temperature range, 2) the protective instrumentation is within its normal operating range, 3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and 4) the reactor pressure vessel is above its minimum RT_{NDT} temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid makeup pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 3.0% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires boric acid solution from the boric acid makeup tanks in the allowable concentrations and volumes of Specification 3.1.2.8 or 53,500 gallons of 1720 ppm borated water from the refueling water tank. However, for the purpose of consistency the minimum required volume of 362,800 gallons above ECCS suction connection in Specification 3.1.2.8 is identical to the more restrictive value of Specification 3.5.4.

With the RCS temperature below 200°F one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a 3.0% delta k/k SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 5465 gallons of 1720 ppm borated water from the refueling water tank or boric acid solution from the boric acid makeup tanks in accordance with the requirements of Specification 3.1.2.7.

REACTIVITY CONTROL SYSTEMS

FLOW PATHS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.2 At least two of the following boron injection flow paths and one associated heat tracing circuit shall be OPERABLE:

- a. Flow paths from one or both boric acid makeup tanks via
 1. The associated gravity feed connection(s) and/or
 2. The associated boric acid makeup pump(s)via charging pump(s) to the RCS
- and/or
- b. The flow path from the refueling water storage tank via charging pump(s) to the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one of the above required boron injection flow paths to the Reactor Coolant System OPERABLE, restore at least two boron injection flow paths to the Reactor Coolant System to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least $3.0\% \Delta k/k$ at 200°F within the next 6 hours; restore at least two flow paths to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.2 At least two of the above required flow paths shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying that the temperature of the heat traced portion of the flow path from the boric acid makeup tanks is above the temperature limit line shown on Figure 3.1-1.
- b. At least once per 31 days by verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. At least once per 18 months during shutdown by verifying that each automatic valve in the flow path actuates to its correct position on a SIAS test signal.
- d. At least once per 18 months by verifying that the flow path required by Specification 3.1.2.2.a delivers at least 40 gpm to the Reactor Coolant System.

REACTIVITY CONTROL SYSTEMS

CHARGING PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.4 At least two charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one charging pump OPERABLE, restore at least two charging pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY and borated to a SHUTDOWN MARGIN equivalent to at least $3.0\% \Delta k/k$ at 200°F within the next 6 hours; restore at least two charging pumps to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.4 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORIC ACID MAKEUP PUMPS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.6 At least the boric acid makeup pump(s) in the boron injection flow path(s) required OPERABLE pursuant to Specification 3.1.2.2a shall be OPERABLE and capable of being powered from an OPERABLE emergency bus if the flow path through the boric acid pump(s) in Specification 3.1.2.2a is OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one boric acid makeup pump required for the boron injection flow path(s) pursuant to Specification 3.1.2.2a inoperable, restore the boric acid makeup pump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 3.0% delta k/k at 200°F; restore the above required boric acid makeup pump(s) to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.6 No additional Surveillance Requirements other than those required by Specification 4.0.5.

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 Each of the following borated water sources shall be OPERABLE:

- a. At least one boric acid makeup tank and at least one associated heat tracing circuit with the contents of the tanks in accordance with Figure 3.1-1, and
- b. The refueling water storage tank with:
 1. A minimum contained borated water volume of 362,800 gallons above the ECCS suction connection,
 2. Between 1720 and 2300 ppm of boron, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the above required boric acid makeup tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least $3.0\% \Delta k/k$ at 200°F; restore the above required boric acid makeup tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 Each borated water sources shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration in the water,
 2. Verifying the contained borated water volume of the water source, and
 3. Verifying the boric acid makeup tank solution temperature.
- b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is less than 40°F or greater than 100°F.

3/4.1 REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1 BORATION CONTROL

3/4.1.1.1 and 3/4.1.1.2 SHUTDOWN MARGIN

A sufficient SHUTDOWN MARGIN ensures that 1) the reactor can be made subcritical from all operating conditions, 2) the reactivity transients associated with postulated accident conditions are controllable within acceptable limits, and 3) the reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

SHUTDOWN MARGIN requirements vary throughout core life as a function of fuel depletion, RCS boron concentration, and RCS T_{avg} . The most restrictive condition occurs at EOL, with T_{avg} at no load operating temperature, and is associated with a postulated steam line break accident and resulting uncontrolled RCS cooldown. In the analysis of this accident, a minimum SHUTDOWN MARGIN of 5.15% $\Delta k/k$ is required to control the reactivity transient. Accordingly, the SHUTDOWN MARGIN requirement is based upon this limiting condition and is consistent with FSAR safety analysis assumptions. With T_{avg} less than or equal to 200°F, the reactivity transients resulting from any postulated accident are minimal and a 3.0% $\Delta k/k$ shutdown margin provides adequate protection.

3/4.1.1.3 MODERATOR TEMPERATURE COEFFICIENT

The limitations on moderator temperature coefficient (MTC) are provided to ensure that the assumptions used in the accident and transient analysis remain valid through each fuel cycle. The surveillance requirements for measurement of the MTC during each fuel cycle are adequate to confirm the MTC value since this coefficient changes slowly due principally to the reduction in RCS boron concentration associated with fuel burnup. The confirmation that the measured MTC value is within its limit provides assurances that the coefficient will be maintained within acceptable values throughout each fuel cycle.

DESCRIPTION OF PROPOSED CHANGE NPF-10-163 AND SAFETY ANALYSIS

This is a request to revise Sections 3.1.2.7 Borated Water Source-Shutdown, 3.1.2.8 Borated Water Sources - Operating, and Bases 3/4.1.2 Boration Systems of the Technical Specifications for San Onofre Nuclear Generating Station Unit 2.

Description

The proposed change revises Technical Specifications 3.1.2.7 Borated Water Source - Shutdown, 3.1.2.8 Borated Water Source - Operating and Bases 3/4.1.2 Boration Systems. Technical Specifications 3.1.2.7 and 3.1.2.8 require borated water source operability and specify volume, temperature and boron concentration requirements which ensure that sufficient negative reactivity control is available during each mode of facility operation. Sections 3.1.2.7 and 3.1.2.8, specify the minimum boric acid storage tank volume and temperature required as a function of the boric acid concentration. The proposed change increases the boric acid storage tank volume/concentration and the minimum refueling water storage tank volume specified by Section 3.1.2.7, consistent with the revised safety analysis associated with plant refueling and Cycle 2 operation. In addition, the proposed change decreases the boric acid storage tank volume/concentration specified in Section 3.1.2.8 by reducing excessive conservatism in the Cycle 1 requirements while maintaining the reactivity control required for Cycle 2 operation.

The Borated Water Source is part of the boron injection system which insures that negative reactivity control is available during each mode of facility operation. This system is required to satisfy 10 CFR Part 50, Appendix A, General Design Criterion 26, "Reactivity Control System Redundancy and Capability." Criterion 26 states that a nuclear power plant should contain two independent reactivity control systems, one of which is capable of holding the reactor core subcritical under shutdown conditions.

Core performance analyses of the Cycle 2 reactor fuel management design show that the boron concentration required to 1) maintain the required SHUTDOWN MARGIN after xenon decay and cooldown to 200°F, and 2) satisfy Criterion 26, has increased due to the differences in core design and core performance characteristics from Cycle 1. As a consequence, the minimum borated volume in the refueling water storage tanks and the minimum boric acid makeup tank volume (Figure 3.1-1) must be revised for Cycle 2 operation in order to meet the Limiting Conditions for Operation on Shutdown Margin. The minimum volume required in the boric acid makeup tank and refueling water storage tank in Modes 5 and 6 has been increased due to the increased Mode 5 Shutdown Margin required for Cycle 2 operation. In addition, the Modes 1 through 4 boric acid makeup tank volume requirement has been decreased in order to facilitate plant operation while providing the required Shutdown Margin. For Cycle 1 operation, borated water from the boric acid storage tank was used during plant shutdown to provide makeup for RCS shrinkage. Makeup for RCS shrinkage during Cycle 2 will be provided from the refueling water storage tank.

Therefore, Sections 3.1.2.8 and B3/4.1.2 have been revised to specify the boric acid storage tank volume/concentration and the refueling water storage tank volume required for negative reactivity control consistent with the requirements of Cycle 2 operation.

Existing Technical Specifications

See Attachment A.

Proposed Technical Specifications

See Attachment B.

Safety Analysis

The proposed change discussed above shall be deemed to constitute a significant hazards consideration if there is a positive finding in any of the following areas.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change is designed to maintain the same or greater shutdown margins in the facility, thus avoiding any increase in the probability or consequences of an accident previously evaluated.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change ensures that sufficient negative reactivity control is available during each mode of facility operation, and maintains the same or greater shutdown margins as in Cycle 1. The proposed change does not result in a condition which could lead to a new or different kind of accident.

3. Will operation of the facility in accordance with this proposed amendment involve a significant reduction in a margin of safety?

Response: No

The specific purpose of the proposed change is to maintain the same margin of safety with respect to the design criteria during Cycle 2 operation as in Cycle 1.

The Commission has provided guidance concerning the application of standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870) of amendments that are considered not likely to involve significant hazards considerations. Example (111) relates to a change resulting from a nuclear reactor core reloading where 1) no fuel assemblies are significantly different from those previously found acceptable

to the NRC for the subject facility, 2) no significant changes are made to the acceptance criteria for the technical specifications, 3) the analytical methods used to demonstrate conformance with the technical specifications and regulations are not significantly changed, and 4) the NRC has previously found such methods acceptable. The proposed change is representative of Example (iii) in that it results from a nuclear reactor core reloading where in particular, no significant changes have been made to the boration source technical specification acceptance criteria or the analytical methodology employed in the determination of the proposed criteria.

Safety and Significant Hazards Determination

Based on the above discussion, the proposed change does not involve a significant hazards consideration in that it does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; (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. In addition, it is concluded that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed change; and (2) this action will not result in a condition which significantly alters the impact of the station on the environment as described in the NRC Final Environmental Statement.

SB:2120F

Attachment A

Existing Technical Specifications

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCE - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.7 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. One boric acid makeup tank and at least one associated heat tracing circuit with the tank contents in accordance with Figure 3.1-1.
- b. The refueling water storage tanks with:
 1. A minimum borated water volume of 5465 gallons above the ECCS suction connection,
 2. A minimum boron concentration of 1720 ppm, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENTS

4.1.2.7 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration of the water,
 2. Verifying the contained borated water volume of the tank, and
 3. Verifying the boric acid makeup tank solution temperature when it is the source of borated water.
- b. At least once per 24 hours by verifying the RWST temperature when it is the source of borated water when the outside air temperature is less than 40°F or greater than 100°F.

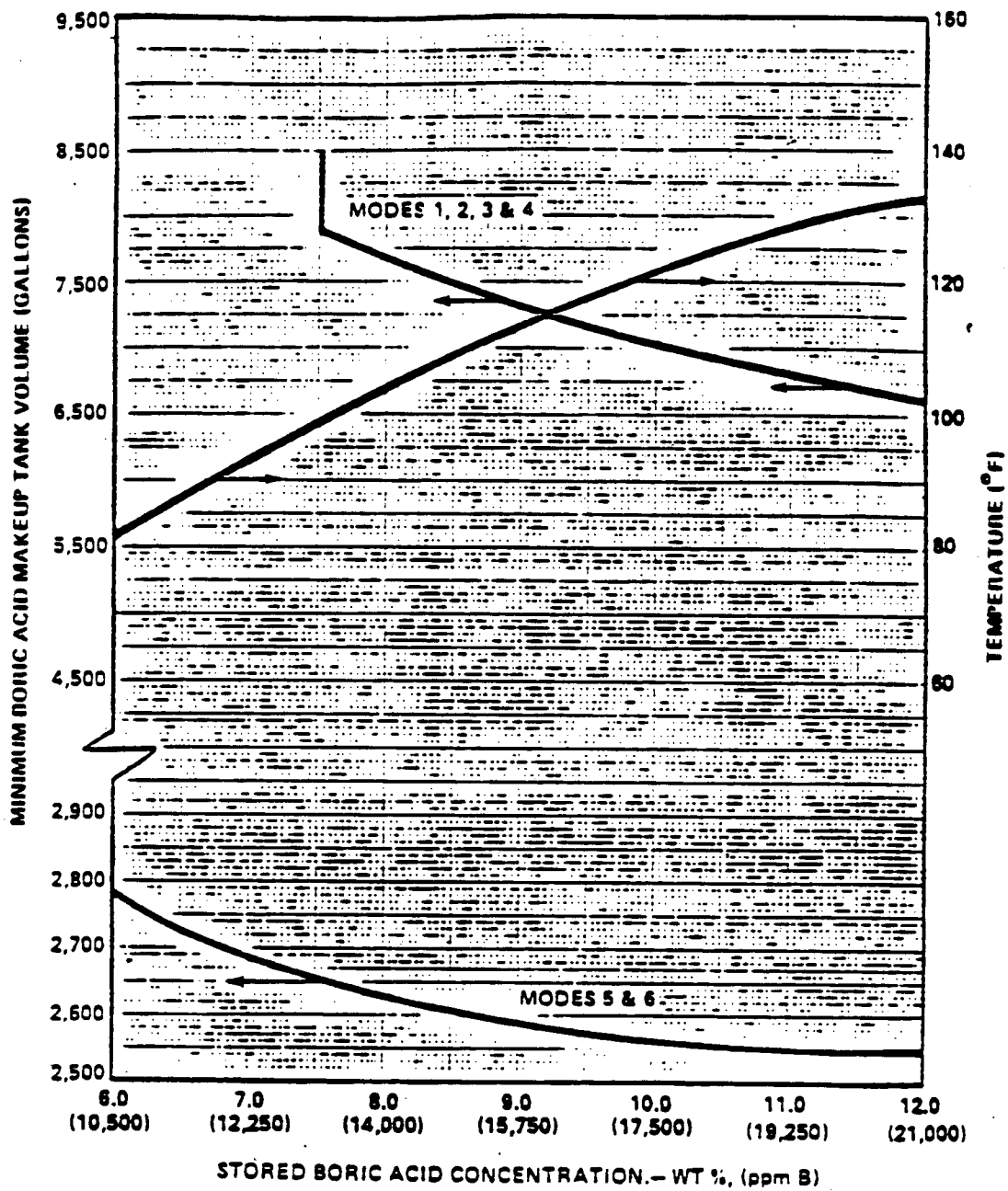


Figure 3.1-1

MINIMUM BORIC ACID STORAGE TANK VOLUME AND TEMPERATURE
AS A FUNCTION OF STORED BORIC ACID CONCENTRATION

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 Each of the following borated water sources shall be OPERABLE:

- a. At least one boric acid makeup tank and at least one associated heat tracing circuit with the contents of the tanks in accordance with Figure 3.1-1, and
- b. The refueling water storage tank with:
 1. A minimum contained borated water volume of 362,800 gallons above the ECCS suction connection,
 2. Between 1720 and 2300 ppm of boron, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the above required boric acid makeup tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 Each borated water sources shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration in the water,
 2. Verifying the contained borated water volume of the water source, and
 3. Verifying the boric acid makeup tank solution temperature.
- b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is less than 40°F or greater than 100°F.

REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.1.1 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 520°F. This limitation is required to ensure 1) the moderator temperature coefficient is within its analyzed temperature range, 2) the protective instrumentation is within its normal operating range, 3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and 4) the reactor pressure vessel is above its minimum RT_{NOT} temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid makeup pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 2.0% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires boric acid solution from the boric acid makeup tanks in the allowable concentrations and volumes of Specification 3.1.2.3 or 53,500 gallons of 1720 ppm borated water from the refueling water tank. However, for the purpose of consistency the minimum required volume of 362,300 gallons above ECCS suction connection in Specification 3.1.2.3 is identical to the more restrictive value of Specification 3.5.4.

With the RCS temperature below 200°F one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a 2% delta k/k SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 5465 gallons of 1720 ppm borated water from the refueling water tank or boric acid solution from the boric acid makeup tanks in accordance with the requirements of Specification 3.1.2.7.

Attachment B

Proposed Technical Specifications

REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCE - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.1.2.7 As a minimum, one of the following borated water sources shall be OPERABLE:

- a. One boric acid makeup tank and at least one associated heat tracing circuit with the tank contents in accordance with Figure 3.1-1.
- b. The refueling water storage tanks with:
 1. A minimum borated water volume of 9970 gallons above the ECCS suction connection,
 2. A minimum boron concentration of 1720 ppm, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 5 and 6.

ACTION:

With no borated water sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

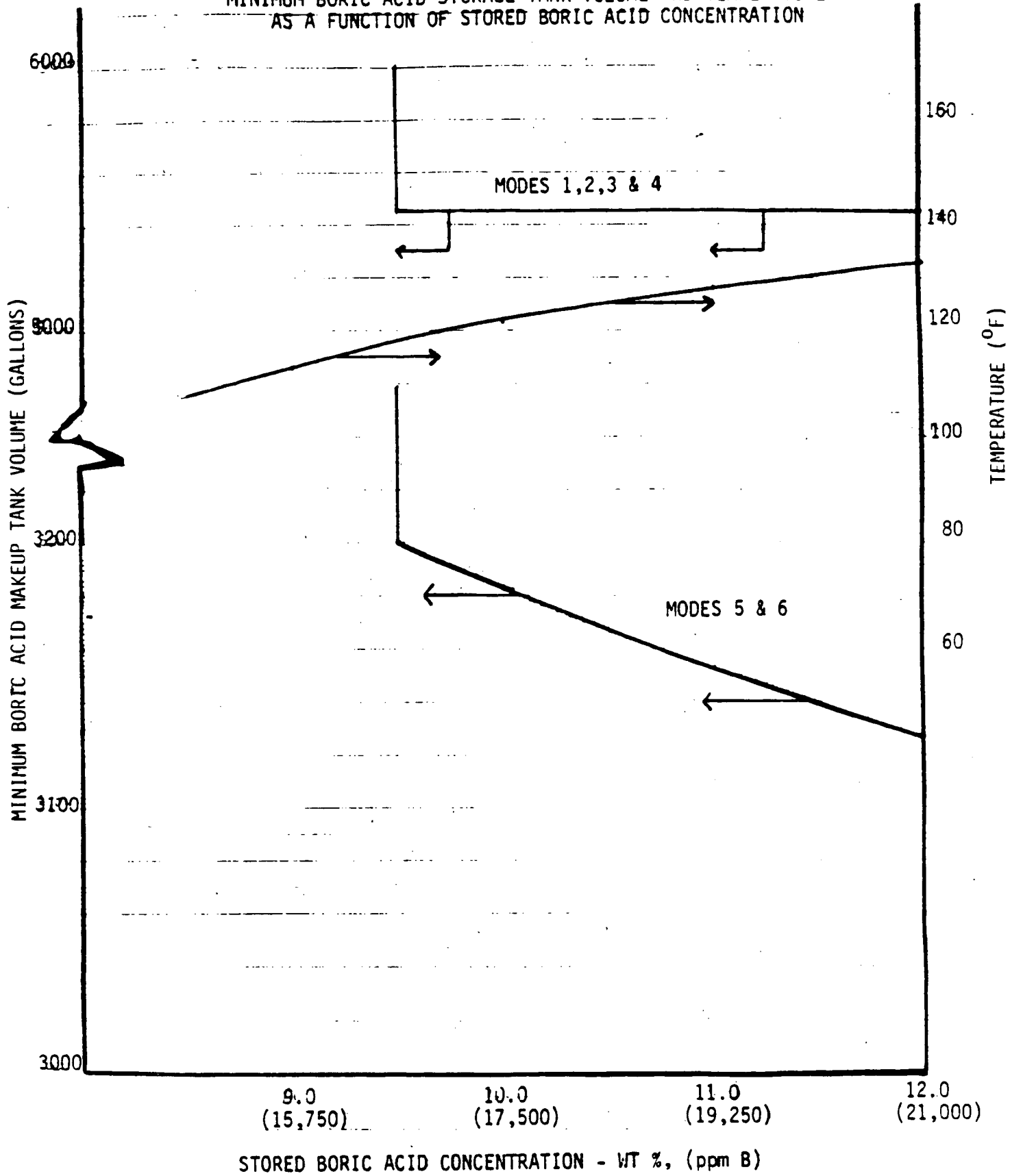
SURVEILLANCE REQUIREMENTS

4.1.2.7 The above required borated water source shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration of the water,
 2. Verifying the contained borated water volume of the tank, and
 3. Verifying the boric acid makeup tank solution temperature when it is the source of borated water.
- b. At least once per 24 hours by verifying the RWST temperature when it is the source of borated water when the outside air temperature is less than 40°F or greater than 100°F.

FIGURE 3.1-1

MINIMUM BORIC ACID STORAGE TANK VOLUME AND TEMPERATURE
AS A FUNCTION OF STORED BORIC ACID CONCENTRATION



REACTIVITY CONTROL SYSTEMS

BORATED WATER SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.2.8 Each of the following borated water sources shall be OPERABLE:

- a. At least one boric acid makeup tank and at least one associated heat tracing circuit with the contents of the tanks in accordance with Figure 3.1-1, and
- b. The refueling water storage tank with:
 1. A minimum contained borated water volume of 362,300 gallons above the ECCS suction connection,
 2. Between 1720 and 2300 ppm of boron, and
 3. A solution temperature between 40°F and 100°F.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With the above required boric acid makeup tank inoperable, restore the tank to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and borated to a SHUTDOWN MARGIN equivalent to at least 2% delta k/k at 200°F; restore the above required boric acid makeup tank to OPERABLE status within the next 7 days or be in COLD SHUTDOWN within the next 30 hours.
- b. With the refueling water tank inoperable, restore the tank to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.1.2.8 Each borated water sources shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 1. Verifying the boron concentration in the water,
 2. Verifying the contained borated water volume of the water source, and
 3. Verifying the boric acid makeup tank solution temperature.
- b. At least once per 24 hours by verifying the RWST temperature when the outside air temperature is less than 40°F or greater than 100°F.

REACTIVITY-CONTROL SYSTEMS

BASES

3/4.1.1.4 MINIMUM TEMPERATURE FOR CRITICALITY

This specification ensures that the reactor will not be made critical with the Reactor Coolant System average temperature less than 520°F. This limitation is required to ensure 1) the moderator temperature coefficient is within its analyzed temperature range, 2) the protective instrumentation is within its normal operating range, 3) the pressurizer is capable of being in an OPERABLE status with a steam bubble, and 4) the reactor pressure vessel is above its minimum RT_{NDT} temperature.

3/4.1.2 BORATION SYSTEMS

The boron injection system ensures that negative reactivity control is available during each mode of facility operation. The components required to perform this function include 1) borated water sources, 2) charging pumps, 3) separate flow paths, 4) boric acid makeup pumps, 5) associated heat tracing systems, and 6) an emergency power supply from OPERABLE diesel generators.

With the RCS average temperature above 200°F, a minimum of two separate and redundant boron injection systems are provided to ensure single functional capability in the event an assumed failure renders one of the systems inoperable. Allowable out-of-service periods ensure that minor component repair or corrective action may be completed without undue risk to overall facility safety from injection system failures during the repair period.

The boration capability of either system is sufficient to provide a SHUTDOWN MARGIN from expected operating conditions of 2.0% delta k/k after xenon decay and cooldown to 200°F. The maximum expected boration capability requirement occurs at EOL from full power equilibrium xenon conditions and requires boric acid solution from the boric acid makeup tanks in the allowable concentrations and volumes of Specification 3.1.2.8 or 81,970 gallons of 1720 ppm borated water from the refueling water tank. However, for the purpose of consistency the minimum required volume of 362,800 gallons above ECCS suction connection in Specification 3.1.2.8 is identical to the more restrictive value of Specification 3.5.4.

With the RCS temperature below 200°F one injection system is acceptable without single failure consideration on the basis of the stable reactivity condition of the reactor and the additional restrictions prohibiting CORE ALTERATIONS and positive reactivity changes in the event the single injection system becomes inoperable.

The boron capability required below 200°F is based upon providing a 2% delta k/k SHUTDOWN MARGIN after xenon decay and cooldown from 200°F to 140°F. This condition requires either 9970 gallons of 1720 ppm borated water from the refueling water tank or boric acid solution from the boric acid makeup tanks in accordance with the requirements of Specification 3.1.2.7.