

REFERENCE USE

CAROLINA POWER AND LIGHT COMPANY
H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

PLANT OPERATING MANUAL

VOLUME 1
PART 2

PLANT PROGRAM PROCEDURE

PLP-100

TECHNICAL REQUIREMENTS MANUAL

REVISION 4

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Carolina Power & Light Company

H. B. Robinson Steam Electric Plant Unit No. 2

TITLE: Technical Requirements Manual Purpose, Control, and Contents

PURPOSE: Provides information and guidance on requirements for various plant conditions, actions, and testing similar to the Technical Specifications, which is mainly required to support appropriate operation of the plant in accordance with commitments. The Technical Requirements Manual is under the control of Carolina Power & Light Company and all changes are to be evaluated for acceptance by performing 10 CFR 50.59 safety evaluations (i.e., completion of an Unreviewed Safety Question Determination Form from REG-NGGC-0002, "10 CFR 50.59 and Other Regulatory Evaluations"). Safety evaluations are required because the TRM is incorporated into the UFSAR by reference.

SCOPE: This manual contains a wide variety of information on and requirements for various systems and processes, most of which existed in the Technical Specifications at some previous point in time.

INTENDED USE: The TRM is intended to be used primarily by Operations to provide operating guidance for various plant equipment (similar to the Technical Specifications) and as an aid for the Technical Specifications (e.g., master and slave relay list). The format of the requirements in the TRM is similar to that in NUMARC 93-03, "Writers Guide for Restructured Standard Technical Specifications".

Noncompliance with TRM requirements requires the generation of a Condition Report in accordance with the Corrective Action Program since the TRM requirements were violated, and other potential consequences exist.

This manual is controlled as a procedure. Changes to this manual may be made in accordance with Administrative Procedure (AP)-021, "Development, Review, and Approval of Changes to the Updated Final Safety Analysis Report and the Independent Spent Fuel Storage Installation Safety Analysis Report," as long as the change are evaluated in accordance with REG-NGGC-0002 and do not constitute a change to the Technical Specifications or an unreviewed safety question.

This procedure has been evaluated in accordance with procedure AP-006, "Procedure Use and Adherence," and determined to be for Reference Use.

3.0 TECHNICAL REQUIREMENTS MANUAL SPECIFICATION (TRMS) APPLICABILITY

TRMS 3.0.1 TRMSs shall be met during the MODES or other specified conditions in the Applicability, except as provided in TRMS 3.0.2.

TRMS 3.0.2 Upon discovery of a failure to meet a TRMS, the Required Compensatory Measures of the associated Conditions shall be met, except as provided in TRMS 3.0.5.

If the TRMS is met or is no longer applicable prior to the expiration of the specified Completion Times(s), completion of the Required Compensatory Measure(s) is not required, unless otherwise stated.

TRMS 3.0.3 When a TRMS is not met and an associated Compensatory Action is not provided, initiate a Condition Report in accordance with the Corrective Action Program.

If a TR is met or not performed within the specified Frequency, except as provided in TR 3.0.3, and the TR is not associated with any TRMS, initiate a Condition Report in accordance with the Corrective Action Program.

TRMS 3.0.4 When a TRMS is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated Compensatory Measures to be entered permit continued operation in the MODE or other specified condition in the applicability for an unlimited period of time. This TRMS shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with Compensatory Measures, or that are part of a shutdown of the unit.

Exceptions to this TRMS are stated in the individual TRMSs. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated Compensatory Measures to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

TRMS 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.

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3.1 PRESSURIZER SAFETY VALVE

TRMS 3.1 One pressurizer safety valve shall be OPERABLE with lift
(CTS 3.1.1.3.a) setting ≥ 2410 psig and ≤ 2560 psig.

APPLICABILITY: MODES 4, 5, and 6 with the reactor head on the vessel and the RCS not open for maintenance.

COMPENSATORY MEASURES

CONDITION	REQUIRED COMPENSATORY ACTION	COMPLETION TIME
A. One required pressurizer safety valve inoperable.	A.1 Initiate action to restore one required pressurizer safety valve to OPERABLE status.	Immediately
	<u>AND</u> A.2 Initiate a Condition Report in accordance with the Corrective Action Program.	Immediately

TEST REQUIREMENTS

TEST	FREQUENCY
TR 3.1.1 Verify required pressurizer safety valve is (CTS Table OPERABLE in accordance with the Inservice 4.1.3 Testing Program. item 3)	In accordance with the Inservice Testing Program

3.3 STEAM GENERATOR (SG) SECONDARY SIDE PRESSURE/TEMPERATURE (P/T) LIMITS

TRMS 3.3 The secondary side of the SGs shall not be pressurized above
(CTS 200 psig when the temperature of the vessel is below 120°F.
3.1.2.2)

APPLICABILITY: At all times.

COMPENSATORY MEASURES

CONDITION	REQUIRED COMPENSATORY ACTION	COMPLETION TIME
A. Requirements of TRMS not met.	A.1 Initiate action to restore SG secondary side P/T to within limits.	Immediately
	<u>AND</u> A.2 Initiate a Condition Report in accordance with the Corrective Action Program.	Immediately

TEST REQUIREMENTS

TEST	FREQUENCY
None.	NA

3.4 PRESSURIZER HEATUP AND COOLDOWN LIMITS

TRMS 3.4
(CTS
3.1.2.3)

- a. The maximum heatup rate of the pressurizer shall be $\leq 100^{\circ}\text{F/hr}$ and the maximum cooldown rate of the pressurizer shall be $\leq 200^{\circ}\text{F/hr}$.

AND

- b. Pressurizer spray shall not be used if the temperature between the pressurizer and the spray fluid is $> 320^{\circ}\text{F}$.

APPLICABILITY: At all times.

COMPENSATORY MEASURES

CONDITION	REQUIRED COMPENSATORY MEASURE	COMPLETION TIME
A. Requirements of TRMS not met.	A.1 Initiate action to restore compliance With the TRMS.	Immediately
	<u>AND</u> A.2 Initiate a Condition Report in accordance with the Corrective Action Program.	Immediately

TEST REQUIREMENTS

TEST	FREQUENCY
None.	NA

3.7 BORIC ACID INJECTION FLOWPATH - MODES 5 and 6

TRMS 3.7 At least one flowpath to the core for boric acid injection (CTS 3.2.1) shall be available with the minimum capability for boric acid injection equivalent to that supplied from the refueling water storage tank.

APPLICABILITY: MODES 5 and 6.

COMPENSATORY MEASURES

CONDITION	REQUIRED COMPENSATORY MEASURE	COMPLETION TIME
A. Requirements of TRMS not met.	A.1 Initiate action to restore compliance with TRMS.	Immediately
	<u>AND</u>	
	A.2 Initiate a Condition Report in accordance with the Corrective Action Program.	Immediately

TEST REQUIREMENTS

TEST	FREQUENCY
None.	NA

BASES

TRMS 3.0.2
(continued)

Completion Times of the associated Required Compensatory Measures would apply from the point in time that the new TRMS becomes applicable and the Compensatory Measures Condition(s) are entered.

TRMS 3.0.3

TRMS 3.0.3 establishes the actions that must be implemented when:

- a. The condition of the unit is not specifically addressed by associated Compensatory Measures. This means that no combination of Conditions stated in the Compensatory Measures can be made that exactly corresponds to the actual condition of the unit.
- b. A TR is specified but the acceptance criteria of the TR are not met or the TR was not performed within the required Frequency, except as provided in TR 3.0.3, and failure to meet the TR does not directly result in failure to meet any specific TRMS.

Under these conditions, as a minimum, a Condition Report must be initiated in accordance with the Corrective Action Program. Initiation of a Condition Report assures that the plant condition will be corrected as required by 10 CFR 50, Appendix B, Criterion XVI, "Corrective Action."

This TRMS is necessary because the TRMS and TRs are requirements relocated from former Technical Specifications. At the time that these requirements were Technical Specifications requirements, the Technical Specifications were originally developed prior to the development of standardized technical specifications (STS). STS included the concept that each Limiting Condition for Operations (LCO) had associated Required Actions to take when the LCO is not met, and associated Surveillance Requirements that verified the LCO was met. Because the original Technical Specifications for H. B. Robinson Steam Electric Plant, Unit No. 2 were not STS, not all LCOs included Required Actions, and not all Surveillance Requirements were associated with LCOs. When requirements were relocated from the Technical Specifications to the TRM, certain relocated requirements lacked association of TRMS to TRs and TRs to TRMS. Therefore, TRMS 3.0.3 was written to assure that no plant condition created by failure to meet a TRMS or TR resulted in no action.

(continued)

BASES (continued)