

3.9 REFUELING OPERATIONS

3.9.2 Nuclear Instrumentation

LC0 3.9.2 Two source range neutron flux monitors shall be OPERABLE.

APPLICABILITY: MODE 6.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required source range neutron flux monitor inoperable	A.1 Verify one Post Accident Monitor (PAM) source range neutron flux monitor provides indication in the Control Room.	15 minutes
	<u>AND</u> A.2 Log indicated PAM source range neutron monitor count rate.	30 minutes <u>AND</u> Once per 30 minutes thereafter
B. Required Actions and Completion Times of Condition A not met.	B.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u> B.2 Suspend positive reactivity additions.	Immediately

(continued)

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ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two required source range neutron flux monitors inoperable.	C.1 Initiate action to restore one source range neutron flux monitor to OPERABLE status.	Immediately
	<u>AND</u>	
	C.2 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	C.3 Suspend positive reactivity additions.	Immediately
	<u>AND</u>	
	C.4 Perform SR 3.9.1.1.	4 hours
		<u>AND</u>
		Once per 12 hours thereafter

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.9.2.1 Perform CHANNEL CHECK.	12 hours
SR 3.9.2.2 -----NOTE----- Neutron detectors are excluded from CHANNEL CALIBRATION. ----- Perform CHANNEL CALIBRATION.	18 months

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BASES

SURVEILLANCE
REQUIREMENTSSR 3.2.3.2 (continued)

monitored at a Surveillance Frequency of 15 minutes to ensure that the AFD is within its limits at high THERMAL POWER levels. At power levels $< 90\%$ RTP or 0.9 APL, whichever is less, but $> 15\%$ RTP, the Surveillance Frequency is reduced to 1 hour because the AFD may deviate from the target band for up to 1 hour using the methodology of Parts B and C of this LCO to calculate the cumulative penalty deviation time before corrective action is required.

SR 3.2.3.2 is modified by a Note that states that monitored and logged values of the AFD are assumed to exist for the preceding 24 hour interval in order for the operator to compute the cumulative penalty deviation time. The AFD should be monitored and logged more frequently in periods of operation for which the power level or control bank positions are changing to allow corrective measures when the AFD is more likely to move outside the target band.

SR 3.2.3.3

Measurement of the target flux difference is accomplished by taking a flux map when the core is at equilibrium xenon conditions, preferably at high power levels with the control banks nearly withdrawn. This flux map provides the equilibrium xenon axial power distribution from which the target value can be determined. The target flux difference varies slowly with core burnup.

A Frequency of 31 EFPD after each refueling and 31 EFPD thereafter for remeasuring the target flux differences adjusts the target flux difference for each excore channel to the value measured at steady state conditions.

A Note modifies this SR to allow the predicted beginning of cycle AFD from the cycle nuclear design to be used to determine the initial target flux difference after each refueling.

A second Note modifies this SR to require that the target flux difference be determined in conjunction with the measurement of the heat flux hot channel factor, $F_q(Z)$, in accordance with SR 3.2.1.1. This is a requirement of the PDC-3 Axial Offset Control Methodology.

(continued)

BASES

APPLICABLE
SAFETY ANALYSIS,
LCO, and
APPLICABILITY

5. Feedwater Isolation (continued)

System is automatically started. The SI signal was discussed previously.

a. Feedwater Isolation—Automatic Actuation Logic and Actuation Relays

Automatic Actuation Logic and Actuation Relays consist of the same features and operate in the same manner as described for ESFAS Function 1.b.

b. Feedwater Isolation—Safety Injection

Feedwater Isolation is also initiated by all Functions that initiate SI. The Feedwater Isolation Function requirements for these Functions are the same as the requirements for their SI function. Therefore, the requirements are not repeated in Table 3.3.2-1. Instead Function 1, SI, is referenced for all initiating functions and requirements.

Feedwater Isolation Functions must be OPERABLE in MODES 1, 2, 3 and 4 (Mode 4 is SI Only) except when all MFIVs, MFRVs, and associated bypass valves are closed or isolated by a closed manual valve when the MFW System is in operation and the turbine generator may be in operation. In MODES 5 and 6, the MFW System and the turbine generator are not in service and this Function is not required to be OPERABLE.

6. Engineered Safety Feature Actuation System Interlocks

To allow some flexibility in unit operations, several interlocks are included as part of the ESFAS. These interlocks permit the operator to block some signals, automatically enable other signals, prevent some actions from occurring, and cause other actions to occur. The interlock Functions back up manual actions to ensure bypassable functions are in operation under the conditions assumed in the safety analyses.

(continued)

BASES (continued)

APPLICABILITY The CREFS Functions must be OPERABLE in MODES 1, 2, 3, 4, and during CORE ALTERATIONS and movement of irradiated fuel assemblies. Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask.

ACTIONS The most common cause of channel inoperability is outright failure or drift of the bistable or process module sufficient to exceed the tolerance allowed by the unit specific calibration procedures. Typically, the drift is found to be small and results in a delay of actuation rather than a total loss of function. This determination is generally made during the performance of a COT, when the process instrumentation is set up for adjustment to bring it within specification. If the Trip Setpoint is less conservative than the tolerance specified by the calibration procedure, the channel must be declared inoperable immediately and the appropriate Condition entered.

A Note has been added to the ACTIONS indicating that separate Condition entry is allowed for each Function. The Conditions of this Specification may be entered independently for each Function listed in Table 3.3.7-1 in the accompanying LCO. The Completion Time(s) of the inoperable channel(s)/train(s) of a Function are tracked separately for each Function starting from the time the Condition was entered for that Function.

A.1

Condition A applies to the automatic actuation Function of the CREFS.

If one train is inoperable, 7 days are permitted to restore it to OPERABLE status. The 7 day Completion Time is the same as is allowed if one train of the mechanical portion of the system is inoperable. The basis for this Completion Time is the same as provided in LCO 3.7.9. If the channel/train cannot be restored to OPERABLE status, one CREFS train must be placed in the emergency pressurization mode of operation. This accomplishes the actuation instrumentation Function and places the unit in a conservative mode of operation.

(continued)

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.17 Chemical and Volume Control System (CVCS)

BASES

BACKGROUND

The function of the CVCS is to provide a source of boric acid makeup water to the RCS at operating temperatures and pressures. The CVCS provides water injection to the Reactor Coolant Pump (RCP) seals and has the additional functions of removing impurities in the RCS, controlling RCS chemistry, and controlling RCS inventory of both Boron and coolant during heatup and cooldown of the reactor (Ref. 1).

During plant operation, reactor coolant flows through the letdown line from a loop cold leg on the discharge side of the RCP. The coolant passes through heat exchangers to reduce the temperature of the coolant. After passing through one of the mixed bed demineralizers, where ionic impurities are removed, coolant flows through the reactor coolant filters and enters the volume control tank through a spray nozzle. From the volume control tank, the coolant flows to the charging pumps which raise the pressure above that in the RCS. The coolant is normally returned to the cold leg of another loop on the discharge side of the pump via a charging line.

A portion of the high pressure charging flow is injected by the charging pumps into the RCPs between the RCP impeller and the shaft seal so that the seals are not exposed to high temperature reactor coolant. Part of the flow is the shaft seal leakage flow and the remainder enters the RCS through a labyrinth seal on the pump shaft. The shaft seal leakage flow cools the lower radial bearing, passes through the seals, is filtered, cooled in the seal water heat exchanger, and returned to the volume control tank. Seal injection flow is measured by a flow indicator for each RCP.

Seal water inleakage to the RCS requires a continuous letdown of reactor coolant to maintain the desired inventory. In addition, bleed and feed of reactor coolant is required for removal of impurities and adjustment of boric acid in the reactor coolant.

(continued)

BASES

APPLICABILITY (continued)

generator secondary inventory, lost as the unit cools to MODE 4 conditions.

In MODE 4 the AFW System may be used for heat removal via the steam generators.

In MODE 5 or 6, the steam generators are not normally used for heat removal, and the AFW System is not required.

ACTIONS

When an AFW pump is found to be inoperable, its associated flow path is also intrinsically inoperable. The "swing" flow path is not made inoperable by the inoperability of a single motor driven AFW pump. Likewise, when a flow path is found inoperable in a manner that prevents flow through an AFW pump, the affected AFW pump is also intrinsically inoperable.

A.1

If one AFW pump or one or two AFW flow path(s) are inoperable, action must be taken to restore them to OPERABLE status within 7 days. The 7 day Completion Time is reasonable, based upon the following:

- a. With any single AFW pump or one or two flow path(s) inoperable, redundant capability to inject flow into at least one steam generator exists.
- b. With the AFW "swing" injection flow path inoperable concurrent with another motor driven flow path inoperable, redundant capability to inject flow into at least one steam generator exists.

Other combinations of inoperable AFW flow paths and pumps result in entry into either Condition B or Condition C.

The second Completion Time for Required Action A.1 establishes a limit on the maximum time allowed for any combination of Conditions to be inoperable during any continuous failure to meet this LCO.

The 8 day Completion Time provides a limitation time allowed in this specified Condition after discovery of failure to meet the LCO. This limit is considered reasonable for

(continued)

BASES

ACTIONS

A.1 (continued)

situations in which Conditions A and B are entered concurrently. The AND connector between 7 days and 8 days dictates that both Completion Times apply simultaneously, and the more restrictive must be met.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

product release presented in the UFSAR, Chapter 15 (Ref. 3).

The worst case single active failure of a component of the CREFS, assuming a loss of offsite power, does not impair the ability of the system to perform its design function.

The CREFS satisfies Criterion 3 of the NRC Policy Statement.

LCO

Two redundant CREFS trains are required to be OPERABLE to ensure that at least one is available assuming a single active failure disables the other train. Total system failure could result in exceeding a dose of 5 rem whole body or its equivalent to any part of the body to the control room operator in the event of a large radioactive release.

The CREFS is considered OPERABLE when the individual components necessary to limit operator exposure are OPERABLE in both trains. A CREFS train is OPERABLE when the air cleaning unit fan, air recirculation fan, air intake damper and associated ductwork, and air exhaust damper and associated ductwork, are operable for the given train. The common air filtration unit is OPERABLE to support either train in accordance with the Ventilation Filter Testing Program. In addition, non-redundant ductwork and gravity dampers are OPERABLE to support either train. Implicit in the OPERABILITY of either train is that the integrity of the control room envelope is such that it can be pressurized to ≥ 0.125 " water gauge relative to the outside atmosphere and to a positive pressure relative to adjacent areas at a make-up rate of ≤ 400 cfm in the emergency pressurization mode.

APPLICABILITY

In MODES 1, 2, 3, 4, during movement of irradiated fuel assemblies and during CORE ALTERATIONS, CREFS must be OPERABLE to control operator exposure during and following a DBA. During movement of irradiated fuel assemblies and CORE ALTERATIONS, the CREFS must be OPERABLE to cope with the release from a fuel handling accident. Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask.

(continued)

BASES (continued)

LCO

Two independent and redundant trains of the CREAC WCCUs are required to be OPERABLE to ensure that at least one is available, assuming a single failure disabling the other train. Total system failure could result in the equipment operating temperature exceeding limits in the event of an accident.

A WCCU train is OPERABLE when the refrigeration equipment of a particular train is capable of removing the design heat load. Implicit in the operability of the WCCU trains are the instrumentation and controls necessary to support automatic start and temperature control operation. Also implicit in the operability of the WCCU trains is the operability of the SWS supply to the WCCU subsystem.

APPLICABILITY

In MODES 1, 2, 3, 4, and during movement of irradiated fuel assemblies and during CORE ALTERATIONS, the WCCUs must be OPERABLE to ensure that the control room temperature will not exceed equipment operational requirements. Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask.

ACTIONS

A.1

With one WCCU train inoperable, action must be taken to restore OPERABLE status within 30 days. In this Condition, the remaining OPERABLE WCCU train is adequate to maintain the control room temperature within limits. However, the overall reliability is reduced because a single failure in the OPERABLE WCCU train could result in loss of cooling function. The 30 day Completion Time is based on the consideration that the remaining train can provide the required cooling.

B.1 and B.2

In MODE 1, 2, 3, or 4, if the inoperable WCCU train cannot be restored to OPERABLE status within the required Completion Time, the unit must be placed in a MODE that minimizes the risk. To achieve this status, the unit must

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

C.1, C.2.1, and C.2.2

During movement of irradiated fuel, or during CORE ALTERATIONS, if the inoperable WCCU train cannot be restored to OPERABLE status within the required Completion Time, the OPERABLE WCCU train must be placed in operation immediately. This action ensures that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that active failures will be readily detected.

An alternative to Required Action C.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require emergency pressurization of the control room. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

D.1 and D.2

During movement of irradiated fuel assemblies, or during CORE ALTERATIONS, with two WCCU trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

E.1

If both WCCU trains are inoperable in MODE 1, 2, 3, or 4, action must be taken to restore at least one WCCU train to OPERABLE status within 48 hours. The 48 hour completion time is based upon the low probability of a Design Basis Accident occurring during this time.

(continued)

B 3.7 PLANT SYSTEMS

B 3.7.11 Fuel Building Air Cleanup System (FBACS)

BASES

BACKGROUND

The FBACS filters airborne radioactive particulates from the area of the spent fuel pool following a fuel handling accident in the Fuel Building. The FBACS, in conjunction with other normally operating systems, also provides environmental control of temperature and humidity in the spent fuel pool area.

The FBACS is a single train system which consists of a heater, a prefilter, a high efficiency particulate air (HEPA) filter, an activated charcoal adsorber section for removal of gaseous activity (principally iodines), and a fan. Ductwork, valves or dampers, and instrumentation also form part of the system.

The FBACS is a manually initiated system, which may also be operated during normal plant operations.

The FBACS is discussed in the UFSAR, Sections 6.5.1, 9.4.5, and 15.7.4 (Refs. 1, 2, and 3, respectively) because it may be used for normal, as well as post accident, atmospheric cleanup functions.

APPLICABLE SAFETY ANALYSES

The FBACS design basis is established by the consequences of the limiting Design Basis Accident (DBA), which is a fuel handling accident in the Fuel Building. The analysis of the fuel handling accident, given in Reference 3, assumes that all fuel rods in an assembly are damaged and the fission product inventory in the gap is released. A decontamination factor of 67 is applied to elemental iodine due to the partitioning effect of the spent fuel pit water. No removal of organic iodine and noble gases by spent fuel pit water is assumed. The FBACS is assumed to be operating during the release and a once through filter efficiency of 90% for elemental iodine and 70% for organic iodine is assumed. All of the release passes through the FBACS due to the negative air pressure maintained by the FBACS in the Fuel Building, (i.e., no bypass leakage is assumed). The integrated dose is calculated using assumptions in Reference 3, which are consistent with the methodology utilized

(continued)

BASES

APPLICABILITY (continued)

- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask.

The AC power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.1.

ACTIONS

A.1

An offsite circuit would be considered inoperable if it were not available to one required ESF train. Although two trains are required by LCO 3.8.10, the one train with offsite power available may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS and fuel movement. By the allowance of the option to declare required features inoperable, with the circuit inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO's ACTIONS.

With the offsite circuit not available to all required trains, the option would still exist to declare all required features inoperable. Since this option may involve undesired administrative efforts, the allowance for sufficiently conservative actions is made. With the required DG inoperable, the minimum required diversity of AC power sources is not available. It is, therefore, required to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions. The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory provided the required SDM is maintained.

Suspension of these activities does not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability or the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC sources and to continue this action until restoration is accomplished in

(continued)

BASES

ACTIONS

A.1 (continued)

order to provide the necessary AC power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS would not be entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ESF bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 would provide the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE REQUIREMENTS

SR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.16 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.17 is excepted because starting independence is not required with the DG(s) that is not required to be operable.

This SR is modified by a Note. The reason for the Note is to minimize the frequency of requiring the OPERABLE DG(s) from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to minimize the frequency of deenergizing a required 480 V ESF bus or disconnecting a required offsite circuit during performance of SRs. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that these SRs must still be capable of being met, but actual performance is not required

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.2.1 (continued)

during periods when the DG and offsite circuit is required to be OPERABLE. Refer to the corresponding Bases for LCO 3.8.1 for a discussion of each SR.

REFERENCES

None.

BASES (continued)

LCO The DC electrical power subsystems, each subsystem consisting of one battery or a battery charger, and the corresponding control equipment and interconnecting cabling within the train, are required to be OPERABLE to support required trains of the distribution systems required OPERABLE by LCO 3.8.10, "Distribution Systems-Shutdown." This ensures the availability of sufficient DC electrical power sources to operate the unit in a safe manner and to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

APPLICABILITY The DC electrical power sources required to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies, provide assurance that:

- a. Required features to provide adequate coolant inventory makeup are available for the irradiated fuel assemblies in the core;
- b. Required features needed to mitigate a fuel handling accident are available;
- c. Required features necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition or refueling condition.

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask. The DC electrical power requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.4.

ACTIONS A.1, A.2.1, A.2.2, A.2.3, and A.2.4

If two trains are required by LCO 3.8.10, the remaining train with DC power available may be capable of supporting sufficient systems to allow continuation of CORE ALTERATIONS and fuel movement. By allowing the option to declare required features inoperable with the associated DC power

(continued)

BASES

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4 (continued)

source(s) inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCO ACTIONS. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). The Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required DC electrical power subsystems and to continue this action until restoration is accomplished in order to provide the necessary DC electrical power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required DC electrical power subsystems should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

SURVEILLANCE REQUIREMENTS

SR 3.8.5.1

SR 3.8.5.1 requires performance of all Surveillances required by SR 3.8.4.1 through SR 3.8.4.6. Therefore, see the corresponding Bases for LCO 3.8.4 for a discussion of each SR.

This SR is modified by a Note. The reason for the Note is to preclude requiring the OPERABLE DC sources from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of SRs. It is the intent that these SRs must still be capable of being met, but actual performance is not required.

(continued)

BASES

APPLICABILITY
(continued)

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask. AC Instrument Bus Sources requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.7.

ACTIONS

A.1, A.2.1, A.2.2, A.2.3, and A.2.4

With one or more required AC instrument bus sources inoperable when two trains are required by LCO 3.8.10, "Distribution Systems - Shutdown," the remaining OPERABLE AC Instrument Bus Sources may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement, and operations with a potential for positive reactivity additions. By the allowance of the option to declare required features inoperable with the associated AC Instrument Bus Source inoperable, appropriate restrictions will be implemented in accordance with the affected required features LCOs' Required Actions. In many instances, this option may involve undesired administrative efforts. Therefore, the allowance for sufficiently conservative actions is made (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions). The

Required Action to suspend positive reactivity additions does not preclude actions to maintain or increase reactor vessel inventory, provided the required SDM is maintained.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of postulated events. It is further required to immediately initiate action to restore the required AC Instrument Bus Sources and to continue this action until restoration is accomplished in order to provide the necessary AC Instrument Bus Source of power to the unit safety systems.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC Instrument Bus Sources should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power or powered from a non-preferred source.

(continued)

BASES (continued)

LCO

Various combinations of subsystems, equipment, and components are required OPERABLE by other LCOs, depending on the specific plant condition. Implicit in those requirements is the required OPERABILITY of necessary support required features. This LCO explicitly requires energization of the portions of the electrical distribution system necessary to support OPERABILITY of required systems, equipment, and components—all specifically addressed in each LCO and implicitly required via the definition of OPERABILITY.

Maintaining these portions of the distribution system energized ensures the availability of sufficient power to operate the unit in a safe manner to mitigate the consequences of postulated events during shutdown (e.g., fuel handling accidents).

APPLICABILITY

The AC and DC electrical power distribution subsystems required to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies, provide assurance that:

- a. Systems to provide adequate coolant inventory makeup are available for the irradiated fuel in the core;
- b. Systems needed to mitigate a fuel handling accident are available;
- c. Systems necessary to mitigate the effects of events that can lead to core damage during shutdown are available; and
- d. Instrumentation and control capability is available for monitoring and maintaining the unit in a cold shutdown condition and refueling condition.

Applicability to movement of irradiated fuel excludes movement of irradiated fuel within a properly sealed spent fuel shipping cask. The AC, DC, and AC instrument bus electrical power distribution subsystems requirements for MODES 1, 2, 3, and 4 are covered in LCO 3.8.9.

(continued)

B 3.9 REFUELING OPERATIONS

B 3.9.2 Nuclear Instrumentation

BASES

BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors are part of the Nuclear Instrumentation System (NIS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core.

The installed source range neutron flux monitors are BF₃ detectors operating in the proportional region of the gas filled detector characteristic curve. The detectors monitor the neutron flux in counts per second. The instrument range covers six decades of neutron flux (1E+6 cps) with a 5% instrument accuracy. The detectors also provide continuous visual indication in the control room and an audible alarm to alert operators to a possible dilution accident. The NIS is designed in accordance with the criteria presented in the UFSAR Section 3.1 (Ref. 1).

APPLICABLE SAFETY ANALYSES

Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as with a boron dilution accident (Ref. 2) or an improperly loaded fuel assembly.

The source range neutron flux monitors satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that two source range neutron flux monitors be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity. For the purposes of this LCO, OPERABILITY of the source range flux monitors includes both channels with continuous visual count rate indication in the control room, and one channel with audible count rate indication available in the containment.

(continued)

BASES (continued)

APPLICABILITY In MODE 6, the source range neutron flux monitors must be OPERABLE to determine changes in core reactivity. There are no other direct means available to check core reactivity levels. In MODES 2, 3, 4, and 5, these same installed source range detectors and circuitry are also required to be OPERABLE by LCO 3.3.1, "Reactor Protection System (RPS) Instrumentation."

ACTIONS A.1 and A.2

With only one required source range neutron flux monitor OPERABLE, an OPERABLE Post Accident Monitor (PAM) source range neutron monitor may be used to provide the required redundancy. Required Action A.1 ensures that the PAM source range neutron monitor is indicating in the control room. Since the PAM source range neutron monitor provides only visual indication of count rate in the Control Room and has no audible count rate capability, Required Action A.2 requires that the indicated count rate from the PAM source range neutron monitor be logged within 30 minutes and once per 30 minutes thereafter. The Completion Times are reasonable considering that there remains one OPERABLE source range monitor with audible count rate and alarm function, and recognition of the time required to complete manual operator actions in response to the boron dilution event.

B.1 and B.2

If the Required Actions and Completion Times of Condition A are not met, redundant means of monitoring core reactivity conditions are not assured. CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action B.1 shall not preclude completion of movement of a component to a safe position.

C.1, C.2, and C.3

With no source range neutron flux monitor OPERABLE, action to restore a monitor to OPERABLE status shall be initiated immediately. Once initiated, action shall be continued

(continued)

BASES (continued)

ACTIONS

C.1, C.2, and C.3 (continued)

until a source range neutron flux monitor is restored to OPERABLE status. Since the source range neutron monitors are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and positive reactivity additions must be suspended immediately. Performance of Required Action C.2 shall not preclude completion of a component to a safe condition.

C.4

With no source range neutron flux monitor OPERABLE, there are no direct means of detecting changes in core reactivity. However, since CORE ALTERATIONS and positive reactivity additions are not to be made, the core reactivity condition is stabilized until the source range neutron flux monitors are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of 4 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration. The Frequency of once per 12 hours ensures that unplanned changes in boron concentration would be identified. The 12 hour Frequency is reasonable, considering the low probability of a change in core reactivity during this time period.

SURVEILLANCE
REQUIREMENTS

SR 3.9.2.1

SR 3.9.2.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.9.3.2

SR 3.9.2.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors consists of obtaining the detector plateau or preamp discriminator curves, evaluating those curves, and comparing the curves to the manufacturer's data. The CHANNEL CALIBRATION for the PAM source range neutron flux monitors only applies to the portion of the channel applicable to providing visual indication of neutron count rate in the Control Room. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. UFSAR, Section 3.1.
 2. UFSAR, Section 15.4.6.
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.6.1 (continued)

The Frequency of 24 hours is based on engineering judgment and is considered adequate in view of the large volume of water and the normal procedural controls of valve positions, which make significant unplanned level changes unlikely.

REFERENCES

1. UFSAR, Section 15.7.4.
 2. 10 CFR 100.10.
 3. Malinowski, D. D., Bell, M. J., Duhn, E., and Locante, J., WCAP-7828, Radiological Consequences of a Fuel Handling Accident, December 1971.
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