

United States Nuclear Regulatory Commission

Attachment III to Serial: RNP-RA/99-0185

3 Pages

H. B. Robinson Steam Electric Plant, Unit No. 2
REQUEST FOR TECHNICAL SPECIFICATION CHANGE
COMPONENT COOLING WATER SYSTEM

**MARKUP OF CURRENT TECHNICAL SPECIFICATION
AND BASES PAGES**

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SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | FREQUENCY |
|---|-----------|
| <p>SR 3.7.6.1 -----NOTE----- Isolation of CCW flow to individual components does not render the CCW System inoperable. -----</p> <p>Verify each required CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p> | 31 days |
| <p>SR 3.7.6.2 Verify each required CCW pump starts automatically on an actual or simulated ESFAS actuation signal.</p> | 18 months |

LOP DG Start undervoltage

BASES . .

ACTIONS

B.1 and B.2 (continued)

allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.6.1

This SR is modified by a Note indicating that the isolation of the CCW flow to individual components may render those components inoperable but does not affect the OPERABILITY of the CCW System.

Verifying the correct alignment for manual, power operated, and automatic valves in the required CCW flow path provides assurance that the proper flow paths exist for CCW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

SR 3.7.6.2

LOP DG Start undervoltage

This SR verifies proper automatic operation of the required CCW pumps on an actual or simulated ESFAS actuation signal. The CCW System is a normally operating system that cannot be fully actuated as part of routine testing during normal operation. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at

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United States Nuclear Regulatory Commission

Attachment IV to Serial: RNP-RA/99-0185

3 Pages

H. B. Robinson Steam Electric Plant, Unit No. 2
REQUEST FOR TECHNICAL SPECIFICATION CHANGE
COMPONENT COOLING WATER SYSTEM

RETYPE TECHNICAL SPECIFICATION AND BASES

SURVEILLANCE REQUIREMENTS

| SURVEILLANCE | FREQUENCY |
|--|------------------|
| <p>SR 3.7.6.1 NOTE.....</p> <p>Isolation of CCW flow to individual components does not render the CCW System inoperable.</p> <p>.....</p> <p>Verify each required CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p> | <p>31 days</p> |
| <p>SR 3.7.6.2 Verify each required CCW pump starts automatically on an actual or simulated LOP DG Start undervoltage signal.</p> | <p>18 months</p> |

BASES . .

ACTIONS

B.1 and B.2 (continued)

allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.6.1

This SR is modified by a Note indicating that the isolation of the CCW flow to individual components may render those components inoperable but does not affect the OPERABILITY of the CCW System.

Verifying the correct alignment for manual, power operated, and automatic valves in the required CCW flow path provides assurance that the proper flow paths exist for CCW operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves are verified to be in the correct position prior to locking, sealing, or securing. This SR also does not apply to valves that cannot be inadvertently misaligned, such as check valves. This Surveillance does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position.

The 31 day Frequency is based on engineering judgment, is consistent with the procedural controls governing valve operation, and ensures correct valve positions.

SR 3.7.6.2

This SR verifies proper automatic operation of the required CCW pumps on an actual or simulated LOP DG Start undervoltage signal. The CCW System is a normally operating system that cannot be fully actuated as part of routine testing during normal operation. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the Surveillance when performed at

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