Luminant

Kenneth J. Peters
Senior Vice President
& Chief Nuclear Officer
Kenneth.Peters@Luminant.com

Luminant Power
P O Box 1002
6322 North FM 56
Glen Rose, TX 76043

T 254 897 6565
C 817 776 0037
F 254 897 6652

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Ref. # 10CFR50.90

April 27, 2016

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: COMANCHE PEAK NUCLEAR POWER PLANT
DOCKET NOS. 50-445 AND 50-446
LICENSE AMENDMENT REQUEST 16-001
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO ADOPT TSF-545, REVISION 3, "TS INSERVICE TESTING PROGRAM REMOVAL & CLARIFY SR USAGE RULE APPLICATION TO SECTION 5.5 TESTING"

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Luminant Generation Company LLC (Luminant Power) is submitting a request for an amendment to the Technical Specifications (TS) for Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2.

The proposed change revises the Technical Specifications (TS) to eliminate the Section 5.5.8, "Inservice Testing Program." A new defined term, "Inservice Testing Program," is added to the TS Definitions section. This request is consistent with TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5.8, "Inservice Testing Program."

This License Amendment Request includes the following attachments:

- Attachment 1 – Description and Assessment of Technical Specifications Changes
- Attachment 2 – Proposed Technical Specifications Changes (Mark-Up)
- Attachment 3 – Revised Technical Specifications (Clean)
- Attachment 4 – Proposed Technical Specification Bases Changes (Mark-Up)

Luminant Power requests approval of the proposed changes by April 27, 2017, with the amendment being implemented within 120 days of issuance.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Texas State Official.

Should you have any questions, please contact Mr. Jack Hicks at (254) 897-6725 or jack.hicks@luminant.com.

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NRR

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

Sincerely,

Luminant Generation Company LLC

Kenneth J. Peters

By: ______________________
Thomas P. McCool
Site Vice President

Attachments -
1. Description and Assessment of Technical Specifications Changes
2. Proposed Technical Specifications Changes (Mark-Up)
3. Revised Technical Specifications (Clean)
4. Proposed Technical Specification Bases Changes (Mark-Up)

c - Marc L. Dapas, Region IV
Margaret M. Watford, NRR
Resident Inspectors, Comanche Peak
Robert Free, TDLR

DESCRIPTION AND ASSESSMENT OF TECHNICAL SPECIFICATION CHANGES

1.0 DESCRIPTION

The proposed change eliminates the Technical Specifications (TS), Section 5.5.8, "Inservice Testing Program," to remove requirements duplicated in American Society of Mechanical Engineers (ASME) Code for Operations and Maintenance of Nuclear Power Plants (OM Code), Case OMN-20, "Inservice Test Frequency." A new defined term, "Inservice Testing Program," is added to TS Section 1.1, "Definitions." The proposed change to the TS is consistent with TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing."

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Luminant Power has reviewed the model safety evaluation provided in the Federal Register Notice of Availability dated March 28, 2016, to the Technical Specifications Task Force in a letter dated December 11, 2015 (NRC ADAMS Accession No. ML15314A305. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-545. Luminant Power concluded that the justification presented in TSTF-545, and the model safety evaluation prepared by the NRC staff are applicable to Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 and justify this amendment for the incorporation of the changes to the CPNPP TS.

CPNPP Unit 1 was issued a construction permit on December 19, 1974, and the provisions of 10 CFR 50.55a(f)(2) are applicable.

CPNPP Unit 2 was issued a construction permit on December 19, 1974, and the provisions of 10 CFR 50.55a(f)(2) are applicable.

2.2 Variations

Luminant Power is proposing the following variations from the TS changes described in the TSTF-545 or the applicable parts of the NRC staff's model safety evaluation dated December 11, 2015:

- LCO 3.0.6: Did not change section number for the Safety Function Determination Program (SFDP). Instead, just stated that Section 5.5.8," Inservice Testing Program," is "Deleted."
- SR 3.7.4.1 and SR 3.7.4.2: Included these SR since the CPNPP TS differ from the Westinghouse STS. However Section 2.2.1 of the TSTF Traveler states the following:

  > The phrase "Inservice Testing Program" may appear in different locations in plant-specific TS. Revising this phrase to be capitalized wherever it may appear is within the scope of this proposed change.

- Retained Section 5.5.8 by annotated as "Deleted" in order to prevent renumbering subsequent sections in Section 5.5.

These variations do not affect the applicability of TSTF-545 or the NRC staff's model safety evaluation to the proposed license amendment.

DESCRIPTION AND ASSESSMENT OF TECHNICAL SPECIFICATION CHANGES

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Luminant Power requests adoption of the Technical Specification (TS) changes described in TSTF-545, TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," which is an approved change to the Improved Standard Technical Specifications (ISTS), into the Comanche Peak Nuclear Power Plant (CPNPP) Units 1 and 2 TS. The proposed changes revises the TS Chapter 5, "Administrative Controls, Section 5.5, "Programs and Manuals, to delete the "Inservice Testing (IST) Program" specification. Requirements in the IST Program are removed, as they are duplicative of requirements in the American Society of Mechanical Engineers (ASME) Operations and Maintenance (OM) Code, as clarified by Code Case OMN-20, "Inservice Test Frequency." Other requirements in Section 5.5 are eliminated because the Nuclear Regulatory Commission (NRC) has determined their appearance in the TS is contrary to regulations. A new defined term, "Inservice Testing Program," is added, which references the requirements of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, paragraph 50.55a(f). Luminant Power has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

   Response: No

   The proposed change revises TS Chapter 5, "Administrative Controls," Section 5.5, "Programs and Manuals," by eliminating the "Inservice Testing Program" specification. Most requirements in the Inservice Testing Program are removed, as they are duplicative of requirements in the ASME OM Code, as clarified by Code Case OMN-20, "Inservice Test Frequency." The remaining requirements in the Section 5.5.8 IST Program are eliminated because the NRC has determined their inclusion in the TS is contrary to regulations. A new defined term, "Inservice Testing Program," is added to the TS, which references the requirements of 10 CFR 50.55a(f).

   Performance of inservice testing is not an initiator to any accident previously evaluated. As a result, the probability of occurrence of an accident is not significantly affected by the proposed change. Inservice test frequencies under Code Case OMN-20 are equivalent to the current testing period allowed by the TS with the exception that testing frequencies greater than 2 years may be extended by up to 6 months to facilitate test scheduling and consideration of plant operating conditions that may not be suitable for performance of the required testing. The testing frequency extension will not affect the ability of the components to mitigate any accident previously evaluated as the components are required to be operable during the testing period extension. Performance of inservice tests utilizing allowances in OMN-20 will not significantly affect the reliability of the tested components. As a result, the availability of the affected components, as well as their ability to mitigate the consequences of accidents previously evaluated, is not affected.

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

DESCRIPTION AND ASSESSMENT OF TECHNICAL SPECIFICATION CHANGES

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

   Response: No

   The proposed change does not alter the design or configuration of the plant. The proposed change does not involve a physical alteration of the plant; no new or different kind of equipment will be installed. The proposed change does not alter the types of inservice testing performed In most cases, the frequency of inservice testing is unchanged. However, the frequency of testing would not result in a new or different kind of accident from any previously evaluated since the testing methods are not altered.

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

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

   Response: No

   The proposed change eliminates some requirements from the TS in lieu of requirements in the ASME Code, as modified by use of Code Case OMN-20. Compliance with the ASME Code is required by 10 CFR 50.55a. The proposed change also allows inservice tests with frequencies greater than 2 years to be extended by 6 months to facilitate test scheduling and consideration of plant operating conditions that may not be suitable for performance of the required testing. The testing frequency extension will not affect the ability of the components to respond to an accident as the components are required to be operable during the testing period extension. The proposed change will eliminate existing TS SR 3.0.3 allowance to defer performance of missed inservice tests up to the duration of the specified testing frequency, and instead will require an assessment of the missed test on equipment operability. This assessment will consider the effect on a margin of safety (equipment operability). Should the component be inoperable, the Technical Specifications provide actions to ensure that the margin of safety is protected. The proposed change also eliminates a statement that nothing in the ASME Code should be construed to supersede the requirements of any TS. The NRC has determined that statement to be incorrect. However, elimination of the statement will have no effect on plant operation or safety.

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

Based on the above, Luminant Power concludes that the proposed change presents no significant hazards considerations under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative

DESCRIPTION AND ASSESSMENT OF TECHNICAL SPECIFICATION CHANGES

occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

1.1 Definitions (continued)

DOSE EQUIVALENT XE-133	DOSE EQUIVALENT XE-133 shall be that concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-87, Kr-88, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1993, "External Exposure to Radionuclides in Air, Water, and Soil", or using the dose conversion factors from Table B-1 of Regulatory Guide 1.109, Revision 1, NRC, 1977.
ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME	The ESF RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.
INSERVICE TESTING PROGRAM	The INSERVICE TESTING PROGRAM is the license program that fulfills the requirements of 10 CFR 50.55a(f).

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.10.1	Verify each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program. Following testing, lift settings shall be within ± 1%.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.14.1	--------------------------------NOTES-------------------------------- 1. Not required to be performed in MODES 3 and 4. 2. Not required to be performed on the RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation. 3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided. ---	
	Verify leakage from each RCS PIV is equivalent to $\leq$ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure $\geq$ 2215 psig and $\leq$ 2255 psig. INSERVICE TESTING PROGRAM	In accordance with the ~~Inservice Testing Program~~, and in accordance with the Surveillance Frequency Control Program. <u>AND</u> Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, and if leakage testing has not been performed in the previous 9 months except for valves 8701A, 8701B, 8702A and 8702B <u>AND</u> Within 24 hours following check valve actuation due to flow through the valve

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.2	Verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.3	Verify ECCS piping is full of water.	Prior to entry into MODE 3
SR 3.5.2.4	Verify each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM
SR 3.5.2.5	Verify each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.6	Verify each ECCS pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.7	Verify, for each ECCS throttle valve listed below, each mechanical position stop is in the correct position. <u>Valve Number</u> 8810A 8816A 8822A 8810B 8816B 8822B 8810C 8816C 8822C 8810D 8816D 8822D	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.8	Verify, by visual inspection, each ECCS train containment sump suction inlet is not restricted by debris and the suction inlet strainers show no evidence of structural distress or abnormal corrosion.	In accordance with the Surveillance Frequency Control Program.

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.6.3.5	Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM
SR 3.6.3.6	Not used.	
SR 3.6.3.7	---NOTE--- This surveillance is not required when the penetration flow path is isolated by a leak tested blank flange. --- Perform leakage rate testing for containment purge, hydrogen purge and containment pressure relief valves with resilient seals.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.3.8	Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.3.9	Not used.	
SR 3.6.3.10	Not used.	
SR 3.6.3.11	Not used.	
SR 3.6.3.12	Not used.	
SR 3.6.3.13	Not used.	

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.6.2	Not used.	
SR 3.6.6.3	Not used.	
SR 3.6.6.4	Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM
SR 3.6.6.5	Verify each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.6.6	Verify each containment spray pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.6.7	Not used.	
SR 3.6.6.8	Verify each spray nozzle is unobstructed.	Following maintenance which could result in nozzle blockage

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.1.1	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. -- Verify each required MSSV lift setpoint per Table 3.7.1-2 in accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM. Following testing, lift setting shall be within ± 1%.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.2.1	-----------------------------------NOTE----------------------------------- Only required to be performed in MODES 1 and 2. -- Verify the isolation time of each MSIV is within limits. INSERVICE TESTING PROGRAM	In accordance with the ~~Inservice Testing Program~~
SR 3.7.2.2	-----------------------------------NOTE----------------------------------- Only required to be performed in MODES 1 and 2. -- Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One or more FIV or FCV bypass valves inoperable.	C.1 Close or isolate bypass valve.	72 hours
	AND	
	C.2 Verify bypass valve is closed or isolated.	Once per 7 days
D. Two valves in the same flowpath inoperable	D.1 Isolate affected flow path.	8 hours
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3.	6 hours
	AND	
	E.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Verify the isolation time of each FIV, FCV, and associated bypass valves is within limits.	In accordance with the ~~Inservice Testing Program~~ INSERVICE TESTING PROGRAM
SR 3.7.3.2	Verify each FIV, FCV, and associated bypass valves actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.4.1	Verify one complete cycle of each ARV.	In accordance with the ~~Inservice testing Program~~
SR 3.7.4.2	Verify one complete cycle of each ARV block valve. INSERVICE TESTING PROGRAM	In accordance with the ~~Inservice testing Program~~

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.5.1	-----------------------------------NOTE----------------------------------- AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. ---	
	Verify each AFW manual, power operated, and automatic valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program.
SR 3.7.5.2	-----------------------------------NOTE----------------------------------- Not required to be performed for the turbine driven AFW pump until 24 hours after $\geq$ 532 psig in the steam generator. ---	
	Verify the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head.	In accordance with the ~~Inservice testing Program~~ INSERVICE TESTING PROGRAM
SR 3.7.5.3	-----------------------------------NOTE----------------------------------- AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. ---	
	Verify each AFW automatic valve that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

5.5 Programs and Manuals (continued)

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

5.5.8 ~~Inservice Testing Program~~ ← Deleted

~~This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:~~

~~a.~~ ~~Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:~~

~~ASME OM Code and applicable Addenda terminology for inservice testing activities~~	~~Required Frequencies for performing inservice testing activities~~
~~Weekly~~	~~At least once per 7 days~~
~~Monthly~~	~~At least once per 31 days~~
~~Quarterly or every 3 months~~	~~At least once per 92 days~~
~~Semiannually or every 6 months~~	~~At least once per 184 days~~
~~Every 9 months~~	~~At least once per 276 days~~
~~Yearly or annually~~	~~At least once per 366 days~~
~~Biennially or every 2 years~~	~~At least once per 731 days~~

~~b.~~ ~~The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities;~~

~~c.~~ ~~The provisions of SR 3.0.3 are applicable to inservice testing activities; and~~

~~d.~~ ~~Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.~~

1.1 Definitions (continued)

DOSE EQUIVALENT XE-133	DOSE EQUIVALENT XE-133 shall be that concentration of Xe-133 (microcuries per gram) that alone would produce the same acute dose to the whole body as the combined activities of noble gas nuclides Kr-85m, Kr-87, Kr-88, Xe-133m, Xe-133, Xe-135m, Xe-135, and Xe-138 actually present. If a specific noble gas nuclide is not detected, it should be assumed to be present at the minimum detectable activity. The determination of DOSE EQUIVALENT XE-133 shall be performed using effective dose conversion factors for air submersion listed in Table III.1 of EPA Federal Guidance Report No. 12, 1993, "External Exposure to Radionuclides in Air, Water, and Soil", or using the dose conversion factors from Table B-1 of Regulatory Guide 1.109, Revision 1, NRC, 1977.
ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME	The ESF RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ESF actuation setpoint at the channel sensor until the ESF equipment is capable of performing its safety function (i.e., the valves travel to their required positions, pump discharge pressures reach their required values, etc.). Times shall include diesel generator starting and sequence loading delays, where applicable. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured. In lieu of measurement, response time may be verified for selected components provided that the components and methodology for verification have been previously reviewed and approved by the NRC.
INSERVICE TESTING PROGRAM	The INSERVICE TESTING PROGRAM is the license program that fulfills the requirements of 10 CFR 50.55a(f).

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.4.10.1	Verify each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program. Following testing, lift settings shall be within ± 1%.	In accordance with the INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.4.14.1	------------------------------NOTES------------------------------ 1. Not required to be performed in MODES 3 and 4. 2. Not required to be performed on the RCS PIVs located in the RHR flow path when in the shutdown cooling mode of operation. 3. RCS PIVs actuated during the performance of this Surveillance are not required to be tested more than once if a repetitive testing loop cannot be avoided. ---	
	Verify leakage from each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig.	In accordance with the INSERVICE TESTING PROGRAM, and in accordance with the Surveillance Frequency Control Program. <u>AND</u> Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, and if leakage testing has not been performed in the previous 9 months except for valves 8701A, 8701B, 8702A and 8702B <u>AND</u> Within 24 hours following check valve actuation due to flow through the valve

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.2	Verify each ECCS manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.3	Verify ECCS piping is full of water.	Prior to entry into MODE 3
SR 3.5.2.4	Verify each ECCS pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.5.2.5	Verify each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.6	Verify each ECCS pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.7	Verify, for each ECCS throttle valve listed below, each mechanical position stop is in the correct position. <u>Valve Number</u> 8810A 8816A 8822A 8810B 8816B 8822B 8810C 8816C 8822C 8810D 8816D 8822D	In accordance with the Surveillance Frequency Control Program.
SR 3.5.2.8	Verify, by visual inspection, each ECCS train containment sump suction inlet is not restricted by debris and the suction inlet strainers show no evidence of structural distress or abnormal corrosion.	In accordance with the Surveillance Frequency Control Program.

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.3.5	Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.3.6	Not used.	
SR 3.6.3.7	-----------------------------------NOTE----------------------------------- This surveillance is not required when the penetration flow path is isolated by a leak tested blank flange. --- Perform leakage rate testing for containment purge, hydrogen purge and containment pressure relief valves with resilient seals.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.3.8	Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.3.9	Not used.	
SR 3.6.3.10	Not used.	
SR 3.6.3.11	Not used.	
SR 3.6.3.12	Not used.	
SR 3.6.3.13	Not used.	

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.6.6.2	Not used.	
SR 3.6.6.3	Not used.	
SR 3.6.6.4	Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.6.6.5	Verify each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.6.6	Verify each containment spray pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.
SR 3.6.6.7	Not used.	
SR 3.6.6.8	Verify each spray nozzle is unobstructed.	Following maintenance which could result in nozzle blockage

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.1.1	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. -- Verify each required MSSV lift setpoint per Table 3.7.1-2 in accordance with the INSERVICE TESTING PROGRAM. Following testing, lift setting shall be within ± 1%.	In accordance with the INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.2.1	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify the isolation time of each MSIV is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.2.2	------------------------------NOTE------------------------------ Only required to be performed in MODES 1 and 2. --- Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. One or more FIV or FCV bypass valves inoperable.	C.1 Close or isolate bypass valve.	72 hours
	AND	
	C.2 Verify bypass valve is closed or isolated.	Once per 7 days
D. Two valves in the same flowpath inoperable	D.1 Isolate affected flow path.	8 hours
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3.	6 hours
	AND	
	E.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.3.1	Verify the isolation time of each FIV, FCV, and associated bypass valves is within limits.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.3.2	Verify each FIV, FCV, and associated bypass valves actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program.

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.4.1	Verify one complete cycle of each ARV.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.4.2	Verify one complete cycle of each ARV block valve.	In accordance with the INSERVICE TESTING PROGRAM

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
SR 3.7.5.1	------------NOTE------------ AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. ------------------------------ Verify each AFW manual, power operated, and automatic valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program.
SR 3.7.5.2	------------NOTE------------ Not required to be performed for the turbine driven AFW pump until 24 hours after ≥ 532 psig in the steam generator. ------------------------------ Verify the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head.	In accordance with the INSERVICE TESTING PROGRAM
SR 3.7.5.3	------------NOTE------------ AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually realigned to the AFW mode of operation. ------------------------------ Verify each AFW automatic valve that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

5.5 Programs and Manuals (continued)

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at 20 year intervals.

5.5.8 Deleted

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following:

a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as-found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.

b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

    1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), all anticipated transients included in the design specification, and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary-to-secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination

5.5 Programs and Manuals (continued)

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program (continued)

with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 1 gpm per SG.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."

c. Provisions for SG tube plugging criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

1. The following alternate tube plugging criteria shall be applied as an alternative to the 40% depth based criteria:

a. For Unit 2 only, tubes with service-induced flaws located greater than 14.01 inches below the top of the tubesheet do not require plugging. Tubes with service-induced flaws located in the portion of the tube from the top of the tubesheet to 14.01 inches below the top of the tubesheet shall be plugged upon detection.

d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. For Unit 1, the number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. For Unit 2, the number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube from 14.01 inches below the top of the tubesheet on the hot leg side to 14.01 inches below the top of the tubesheet on the cold leg side and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements below, the inspection scope, inspection methods and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. A degradation assessment shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program (continued)

assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.

2. For the Unit 2 model D5 steam generators (Alloy 600 thermally treated) after the first refueling outage following SG installation, inspect each SG at least every 48 effective full power months or at least every other refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, and c below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.

    a. After the first refueling outage following SG installation, inspect 100% of the tubes during the next 120 effective full power months. This constitutes the first inspection period;

    b. During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the second inspection period; and

    c. During the remaining life of the SGs, inspect 100% of the tubes every 72 effective full power months. This constitutes the third and subsequent inspection periods.

3. For the Unit 1 model Delta-76 steam generators (Alloy 690 thermally treated) after the first refueling outage following SG installation, inspect each SG at least every 72 effective full power months or at least every

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program (continued)

third refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c and d below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.

a. After the first refueling outage following SG installation, inspect 100% of the tubes during the next 144 effective full power months. This constitutes the first inspection period;

b. During the next 120 effective full power months, inspect 100% of the tubes. This constitutes the second inspection period;

c. During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the third inspection period; and

d. During the remaining life of the SGs, inspect 100% of the tubes every 72 effective full power months. This constitutes the fourth and subsequent inspection periods.

4. For Unit 1, if crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indications shall not exceed 24 effective full power months or one refueling outage (whichever results in more frequent inspections). For Unit 2, if crack indications are found in any SG tube from 14.01 inches below the top of the tubesheet on the hot leg side to 14.01 inches below the top of the tubesheet on the cold leg side, then the next inspection for each affected and potentially affected SG for the degradation mechanism

5.5 Programs and Manuals

5.5.9 Unit 1 Model D76 and Unit 2 Model D5 Steam Generator (SG) Program (continued)

that caused the crack indications shall not exceed 24 effective full power months or one refueling outage (whichever results in more frequent inspections). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.

e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.10 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables;

b. Identification of the procedures used to measure the values of the critical variables;

c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.11 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2 and in accordance with Regulatory Guide 1.52, Revision 2, ANSI/ASME N509-1980, ANSI/ASME N510-1980, and ASTM D3803-1989.

5.5 Programs and Manuals (continued)

5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

-----NOTE-----
ANSI/ASME N510-1980, ANSI/ASME N509-1980, and ASTM D3803-1989 shall be used in place of ANSI 510-1975, ANSI/ASME N509-1976, and ASTM D3803-1979 respectively in complying with Regulatory Guide 1.52, Revision 2.

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 1.0% for Primary Plant Ventilation System - ESF Filtration units and < 0.05% for all other units when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI/ASME N510-1980 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate
Control Room Emergency filtration unit	8,000 CFM
Control Room Emergency pressurization unit	800 CFM
Primary Plant Ventilation System – ESF filtration unit	15,000 CFM

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 1.0% for Primary Plant Ventilation System - ESF Filtration units and < 0.05% for all other units when tested in accordance with Regulatory Guide 1.52, Revision 2, and ANSI/ASME N510-1980 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate
Control Room Emergency filtration unit	8,000 CFM
Control Room Emergency pressurization unit	800 CFM
Primary Plant Ventilation System - ESF filtration unit	15,000 CFM

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5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of ≤ 30°C and greater than or equal to the relative humidity specified below.

ESF Ventilation Systems	Penetration	RH
Control Room Emergency filtration unit	0.5%	70%
Control Room Emergency pressurization unit	0.5%	70%
Primary Plant Ventilation System – ESF filtration unit	2.5%	70%

d. Demonstrate at least once per 18 months for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in

accordance with Regulatory Guide 1.52, Revision 2, and ANSI/ASME N510-1980 at the system flowrate specified below ± 10%

ESF Ventilation System	Delta P	Flowrate
Control Room Emergency filtration unit	8.0 in WG	8000 CFM
Control Room Emergency pressurization unit	9.5 in WG	800 CFM
Primary Plant Ventilation System – ESF filtration unit.	8.5 in WG	15000 CFM

e. Demonstrate at least once per 18 months that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ANSI/ASME N510-1980.

ESF Ventilation System	Wattage
Control Room Emergency pressurization unit	10 ± 1 kW
Primary Plant Ventilation System - ESF filtration unit	100 ± 5 kW

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.12 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Gaseous Waste Processing System, the quantity of radioactivity contained in each Gas Decay Tank, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure," Revision 0, July 1981. The liquid radwaste quantities shall be determined in accordance with Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures," Revision 2, July 1981.

The program shall include:

a. The limits for concentrations of hydrogen and oxygen in the Gaseous Waste Processing System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);

b. A surveillance program to ensure that the quantity of radioactivity contained in each Gas Decay Tank is less than the amount that would result in a whole body exposure of $\geq$ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and

c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

d. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.13 <u>Diesel Fuel Oil Testing Program</u>

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

5.5.13 Diesel Fuel Oil Testing Program (continued)

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

3. a clear and bright appearance with proper color or a water and sediment content within limits.

b. Within 31 days following addition of the new fuel oil to the storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil, and

c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program.

5.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. a change in the TS incorporated in the license; or

2. a change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 5.5.14b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) and exemptions thereto.

5.5 Programs and Manuals (continued)

5.5.15 Safety Function Determination Program (SFDP)

a. This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

1. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;

2. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;

3. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and

4. Other appropriate limitations and remedial or compensatory actions.

b. A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

1. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or

2. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or

3. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.16 Containment Leakage Rate Testing Program

a. A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in

accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program, dated September, 1995" as modified by the following exceptions:

1. The visual examination of containment concrete surfaces intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B testing, will be performed in accordance with the requirements of and frequency specified by the ASME Section XI Code, Subsection IWL, except where relief has been authorized by the NRC.

2. The visual examination of the steel liner plate inside containment intended to fulfill the requirements of 10 CFR 50, Appendix J, Option B, will be performed in accordance with the requirements of and frequency specified by the ASME Section XI Code, Subsection IWE, except where relief has been authorized by the NRC.

3. NEI 94-01 – 1995, Section 9.2.3: The first Type A Test performed after the December 7, 1993 Type A Test (Unit 1) and the December 1, 1997 Type A Test (Unit 2) shall be performed no later than December 15, 2008 (Unit 1) and December 9, 2012 (Unit 2)."

b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 48.3 psig.

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

d. Leakage rate acceptance criteria are:

1. Containment leakage rate acceptance criteria is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for Type A tests;

2. Air lock testing acceptance criteria are:

    i. Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

    ii. For each door, leakage rate is $\leq 0.01\ L_a$ when pressurized to $\geq P_a$.

5.5 Programs and Manuals

5.5.16 Containment Leakage Rate Testing Program (continued)

e. The provision of SR 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program, with the exception of the containment ventilation isolation valves.

f. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

5.5.17 Technical Requirements Manual (TRM)

The TRM contains selected requirements which do not meet the criteria for inclusion in the Technical Specification but are important to the operation of CPNPP. Much of the information in the TRM was relocated from the TS.

Changes to the TRM shall be made under appropriate administrative controls and reviews. Changes may be made to the TRM without prior NRC approval provided the changes do not require either a change to the TS or NRC approval pursuant to 10 CFR 50.59. TRM changes require approval of the Plant Manager.

5.5.18 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1, at-power, internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Action for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Action for unplanned entry into the LCO Action.

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Action.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.19 Battery Monitoring and Maintenance Program

5.5 Programs and Manuals

This Program provides for restoration and maintenance, based on the recommendations of IEEE Standard 450, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer for the following:

a. Actions to restore battery cells with float voltage < 2.13 V, and

b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plates.

5.5.20 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Filtration System (CREFS), CRE occupants can control the reactor safety under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem whole body or its equivalent to any part of the body for the duration of the accident. The program shall include the following elements:

a. The definition of the CRE and the CRE boundary.

b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.

c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.

   The following are exceptions to Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0:

   1. C. - Section 4.3.2 "Periodic CRH Assessment" from NEI 99-03 Revision 1 will be used as input to a site specific Self Assessment procedure.

   2. C.1.2 - No peer reviews are required to be performed.

5.5.20 Control Room Envelope Habitability Program (continued)

d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the CREFS, operating at the flow rate required by the VFTP, at a Frequency of 18 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 18 month assessment of the CRE boundary.

e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.

f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.

5.5.21 Surveillance Frequency Control Program

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.

b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI-04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

c. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

5.5.22 Spent Fuel Storage Rack Neutron Absorber Monitoring Program

The Region I storage cells in the CPNPP Spent Fuel Pool utilize the neutron absorbing material BORAL, which is credited in the Safety Analysis to ensure the limitations of Technical Specification 4.3.1.1 are maintained.

5.5.22 Spent Fuel Storage Rack Neutron Absorber Monitoring Program (continued)

In order to ensure the reliability of the Neutron Poison material, a monitoring program is required to routinely confirm that the assumptions utilized in the criticality analysis remain valid and bounding. The Neutron Absorber Monitoring Program is established to monitor the integrity of neutron absorber test coupons periodically as described below.

A test coupon "tree" shall be maintained in each SFP. Each coupon tree originally contained 8 neutron absorber surveillance coupons. Detailed measurements were taken on each of these 16 coupons prior to installation, including weight, length, width, thickness at several measurement locations, and B-10 content (g/cm^2). These coupons shall be maintained in the SFP to ensure they are exposed to the same environmental conditions as the neutron absorbers installed in the Region I storage cells, until they are removed for analysis.

One test coupon from each SFP shall be periodically removed and analyzed for potential degradation, per the following schedule. The schedule is established to ensure adequate coupons are available for the planned life of the storage racks.

Year	Coupon Number	Year	Coupon Number
2013	1	2028	5
2015	2	2033	6
2018	3	2043	7
2023	4	2053	8

Further evaluation of the absorber materials, including an investigation into the degradation and potential impacts on the Criticality Safety Analysis, is required if:

- A decrease of more than 5% in B-10 content from the initial value is observed in any test coupon as determined by neutron attenuation.
- An increase in thickness at any point is greater than 25% of the initial thickness at that point.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs

SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.2 and SR 3.0.3 apply in Chapter 5 only when invoked by a Chapter 5 specification.

SR 3.0.1

SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the SRs; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply.

(continued)

BASES

SR 3.0.1 (continued)

Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status. Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

When a Section 5.5, “Programs and Manuals,” specification state that the provisions of SR 3.0.2 are applicable, a 25% extension of the testing interval, whether stated in the specification or incorporated by reference, is permitted.

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS.

Examples of where SR 3.0.2 does not apply are the Containment Leakage Rate Testing Program requiared by 10 CFR 50, Appendix J, and the inservice testing of pumps and valves in accordance with applicable American Society of Mechanical Engineers Operation and Maintenance

(continued)

BASES

SR 3.0.2 (continued)

Code, as required by 10 CFR 50.55a. These programs establish testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves, extend a test interval specified in the regulation directly or by reference.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.3 are applicable, it permits the flexibility to defer declaring the testing requirements not met in accordance with SR 3.0.3 when the testing has not been completed within the testing interval (including the allowance of SR 3.0.2 if invoked by the Section 5.5 specification).

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

conditions in an orderly manner and without challenging plant systems. With any RCS cold leg temperatures at or below 320°F, overpressure protection is provided by the LTOP System. The change from MODE 1, 2, or 3 to MODE 4 reduces the RCS energy (core power and pressure), lowers the potential for large pressurizer insurges, and thereby removes the need for overpressure protection by three pressurizer safety valves.

SURVEILLANCE REQUIREMENTS

SR 3.4.10.1

SRs are specified in the INSERVICE TESTING PROGRAM. Pressurizer safety valves are to be tested in accordance with the requirements of the ASME Code (Ref. 4), which provides the activities and Frequencies necessary to satisfy the SRs. No additional requirements are specified.

REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III.
2. FSAR, Chapter 15.
3. WCAP-7769, Rev. 1, June 1972.
4. ASME Code for Operation and Maintenance of Nuclear Power Plants.

BASES

BACKGROUND (continued)

pumps. While these valves are open and the RHR suction valves are open, the RHR suction relief valves are exposed to the RCS and are able to relieve pressure transients in the RCS.

The RHR suction isolation valves must be open to make the RHR suction relief valves OPERABLE for RCS overpressure mitigation. The RHR suction relief valves are spring loaded, bellows type water relief valves with pressure tolerances and accumulation limits established by Section III of the American Society of Mechanical Engineers (ASME) Code (Ref. 3) for Class 2 relief valves. These valves are tested in accordance with the INSERVICE TESTING PROGRAM (IST).

RCS Vent Requirements

Once the RCS is depressurized, a vent exposed to the containment atmosphere will maintain the RCS at containment ambient pressure in an RCS overpressure transient, if the relieving requirements of the transient do not exceed the capabilities of the vent. Thus, the vent path must be capable of relieving the flow resulting from the limiting LTOP mass or heat input transient, and maintaining pressure below the P/T limits. The required vent capacity may be provided by one or more vent paths.

APPLICABLE SAFETY ANALYSES

Safety analyses (Ref. 4) demonstrate that the reactor vessel is adequately protected against exceeding the Reference 1 P/T limits. In MODES 1, 2, and 3, and in MODE 4 with RCS cold leg temperature exceeding 320°F, the pressurizer safety valves will prevent RCS pressure from exceeding the Reference 1 limits. At about 320°F and below, overpressure prevention falls to two OPERABLE RCS relief valves or to a depressurized RCS and a sufficient sized RCS vent. Each of these means has a limited overpressure relief capability.

The actual temperature at which the pressure in the P/T limit curve falls below the pressurizer safety valve setpoint increases as the reactor vessel material toughness decreases due to neutron embrittlement. Each time the PTLR curves are revised, the LTOP System must be re-evaluated to ensure its functional requirements can still be met using the RCS relief valve method or the depressurized and vented RCS condition.

The PTLR contains the acceptance limits that define the LTOP requirements. Any change to the RCS must be evaluated against the analyses to determine the impact of the change on the LTOP acceptance limits.

(continued)

BASES

ACTIONS

G.1 (continued)

The Completion Time considers the time required to place the plant in this Condition and the relatively low probability of an overpressure event during this time period due to increased operator awareness of administrative control requirements.

SURVEILLANCE REQUIREMENTS

SR 3.4.12.1, SR 3.4.12.2, and SR 3.4.12.3

To minimize the potential for a low temperature overpressure event by limiting the mass input capability, a maximum of zero safety injection pumps and a maximum of two charging pumps are verified capable of injecting into the RCS and the accumulator discharge isolation valves are verified closed and locked out. Verification that each accumulator is isolated is only required when accumulator isolation is required as stated in Note 1 to the Applicability.

The safety injection pumps and charging pump are rendered incapable of injecting into the RCS, for example, through removing the power from the pumps by racking the breakers out under administrative control or by isolating the discharge of the pump by closed isolation valves with power removed from the operators or by a manual isolation valve secured in the closed position. Alternate methods of LTOP prevention may be employed to prevent a pump start such that a single failure will not result in an injection into the RCS. Providing pumps are rendered incapable of injecting into the RCS, they may be energized for purposes such as testing or for filling accumulators.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.4.12.4

Each required RHR suction relief valve shall be demonstrated OPERABLE by verifying its RHR suction isolation valves are open and by testing it in accordance with the INSERVICE TESTING PROGRAM. This Surveillance is only required to be performed if the RHR suction relief valve is being used to meet this LCO.

The RHR suction isolation valves are verified to be opened. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

SURVEILLANCE REQUIREMENTS

SR 3.4.12.4 (continued)

The ASME Code (Ref. 8), test per INSERVICE TESTING PROGRAM verifies OPERABILITY by proving proper relief valve mechanical motion and by measuring and, if required, adjusting the lift setpoint.

SR 3.4.12.5

The RCS vent of ≥ 2.98 square inches is proven OPERABLE by verifying its open condition. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

Any passive vent path arrangement must only be open when required to be OPERABLE. This Surveillance is required if the vent is being used to satisfy the pressure relief requirements of the LCO 3.4.12.

SR 3.4.12.6

The PORV block valve must be verified open to provide the flow path for each required PORV to perform its function when actuated. The valve must be remotely verified open in the main control room. This Surveillance is performed if the PORV satisfies the LCO.

The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required removed, and the manual operator is not required locked in the inactive position. Thus, the block valve can be closed in the event the PORV develops excessive leakage or does not close (sticks open) after relieving an overpressure situation.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.4.12.7

Not Used

SR 3.4.12.8

Performance of a COT is required within 12 hours after decreasing RCS temperature to ≤ 350°F on each required PORV to verify and, as necessary, adjust its lift setpoint. The COT will verify the setpoint is within pre-established calibration tolerances of the nominal PORV setpoints presented in the PTLR. PORV actuation could depressurize the RCS and is not required.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.5.2.4

Periodic surveillance testing of ECCS pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems is required by the ASME Code. This type of testing may be accomplished by measuring the pump developed head at only one point of the pump characteristic curve. The following ECCS pumps are required to develop the indicated differential pressure on recirculation flow:

1) Centrifugal charging pump $\geq$ 2370 psid,
2) Safety injection pump $\geq$ 1440 psid, and
3) RHR pump > 170 psid.

This verifies both that the measured performance is within an acceptable tolerance of the original pump baseline performance and that the performance at the test flow is greater than or equal to the performance assumed in the plant safety analysis. SRs are specified in the INSERVICE TESTING PROGRAM of the ASME Code. The ASME Code and the Technical Requirements Manual provides the activities and Frequencies necessary to satisfy the requirements.

SR 3.5.2.5 and SR 3.5.2.6

These Surveillances demonstrate that each automatic ECCS valve actuates to the required position on an actual or simulated SI signal and that each ECCS pump starts on receipt of an actual or simulated SI signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.7

The correct alignment of throttle valves in the ECCS flow path on an SI signal is necessary for proper ECCS performance. Valves 8810A, B, C, D are provided in the charging pump to cold leg injection lines. Valves 8822A, B, C, D are provided in the SI pump to cold leg injection lines. These manual throttle valves are positioned following flow balancing and have mechanical locks to ensure that the proper positioning for restricted flow to a ruptured cold leg is maintained and that the other cold legs receive at least the required minimum flow. Valves 8816A, B, C, D are provided in the SI pump to hot leg recirculation lines. These manual throttle valves are positioned

(continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.3.5 (continued)

test ensures the valve will isolate in a time period less than or equal to that assumed in the FSAR [Ref. 2]. The isolation time and Frequency of this SR are in accordance with the Technical Requirements Manual and the INSERVICE TESTING PROGRAM.

SR 3.6.3.6

Not used.

SR 3.6.3.7

The Containment Purge, Hydrogen Purge, and Containment Pressure Relief valves with resilient seals, are leakage rate tested per the requirements of 10 CFR 50, Apppendix J, Option B to ensure OPERABILITY.

The containment purge, hydrogen purge, and containment pressure relief valves are tested in accordance with the Containment Leakage Rate Testing Program. Leakage rate acceptance criteria applies as follows:

a. The inboard and outboard isolation valves with resilient material seals in each locked closed 48 inch containment purge and 12 inch hydrogen purge supply and exhaust penetration measured leakage rate is < 0.05 L_a when pressurized to P_a.

b. Each 18 inch containment pressure relief discharge isolation valve with resilient material seals measured leakage rate is < 0.06 L_a when pressurized to P_a.

The Note is a clarification that leakage rate testing is not required for containment purge valves with resilient seals when their penetration flow path is isolated by a leak tested blank flange.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.3.8

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each Phase "A" automatic containment isolation valve will actuate to its isolation position on a Phase "A" Isolation signal, each Phase "B" automatic containment isolation valve will actuate to

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.6.1

Verifying the correct alignment for manual, power operated, and automatic valves in the containment spray flow path provides assurance that the proper flow paths will exist for Containment Spray System operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these were verified to be in the correct position prior to locking, sealing, or securing. This SR does not require any testing or valve manipulation. Rather, it involves verification through a system walkdown (which may include the use of local or remote indicators), that those valves outside containment (only check valves are inside containment) and capable of potentially being mispositioned are in the correct position. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.6.6.2

Not Used

SR 3.6.6.3

Not Used

SR 3.6.6.4

Verifying each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head (specified in the Technical Requirements Manual) ensures that spray pump performance has not degraded during the cycle. Flow and differential pressure are normal tests of centrifugal pump performance required by the ASME Code (Ref. 5). Since the containment spray pumps cannot be tested with flow through the spray headers, they are tested on recirculation flow via a test header. This test confirms one point on the pump design curve and is indicative of overall performance. Such inservice tests confirm component OPERABILITY, trend performance, and detect incipient failures by abnormal performance. The Frequency of the SR is in accordance with the INSERVICE TESTING PROGRAM.

SR 3.6.6.5 and SR 3.6.6.6

These SRs require verification that each automatic containment spray valve actuates to its correct position on an actual or simulated actuation of a containment “P” (High-3) signal and that each containment spray pump starts upon receipt of an actual or simulated actuation of a containment “S” (High-1) and “P” (High-3) pressure signals. This Surveillance is not required

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

lowering the Power Range Neutron Flux-High setpoint to an appropriate value. When the Moderator Temperature Coefficient (MTC) is positive, the reactor power may increase above the initial value during an RCS heatup event (e.g., turbine trip). Thus, for any number of inoperable MSSVs it is necessary to reduce the trip setpoint if a positive MTC may exist at partial power conditions, unless it is demonstrated by analysis that a specified reactor power reduction alone is sufficient to prevent overpressurization of the steam system. The MSSVs are assumed to have one active failure mode. The active failure mode is an inadvertent opening and failure to reclose once opened. The passive failure mode which is the failure to open upon demand is not assumed (Ref. 3).

The MSSVs satisfy Criterion 3 of 10CFR50.36(c)(2)(ii).

LCO

The accident analysis requires that five MSSVs per steam generator be OPERABLE to provide overpressure protection for design basis transients occurring at 102% RTP. The LCO requires that five MSSVs per steam generator be OPERABLE in compliance with Reference 2, and the DBA analysis.

The OPERABILITY of the MSSVs is defined as the ability to open upon demand within the setpoint tolerances, to relieve steam generator overpressure, and reseat when pressure has been reduced. The OPERABILITY of the MSSVs is determined by periodic surveillance testing in accordance with the INSERVICE TESTING PROGRAM.

This LCO provides assurance that the MSSVs will perform their designed safety functions to mitigate the consequences of accidents that could result in a challenge to the RCPB or Main Steam System integrity.

APPLICABILITY

In MODES 1, 2, and 3, five MSSVs per steam generator are required to be OPERABLE to prevent Main Steam System overpressurization.

In MODES 4 and 5, there are no credible transients requiring the MSSVs. The steam generators are not normally used for heat removal in MODES 5 and 6, and thus cannot be overpressurized; there is no requirement for the MSSVs to be OPERABLE in these MODES.

(continued)

ACTIONS

B.1 and B.2 (continued)

The maximum THERMAL POWER corresponding to the heat removal capacity of the remaining OPERABLE MSSVs is determined via a system transient analysis with an appropriate allowance for Nuclear Instrumentation System trip channel uncertainties.

To determine the Table 3.7.1-1 Maximum Allowable Power for Action B (% RTP), the calculated Maximum NSSS Power is reduced by 9.0% to account for Nuclear Instrumentation System trip channel uncertainties.

Required Action B.2 is modified by a Note, indicating that the Power Range Neutron Flux-High reactor trip setpoint reduction is only required in MODE 1. In MODES 2 and 3 the reactor protection system trips specified in LCO 3.3.1, "Reactor Trip System Instrumentation," provide sufficient protection.

The allowed Completion Times are reasonable based on operating experience to accomplish the Required Actions in an orderly manner without challenging unit systems.

C.1 and C.2

If the Required Actions are not completed within the associated Completion Time, or if one or more steam generators have ≥ 4 inoperable MSSVs, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 12 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.

SURVEILLANCE REQUIREMENTS

SR 3.7.1.1

This SR verifies the OPERABILITY of the MSSVs by the verification of each MSSV lift setpoint in accordance with the INSERVICE TESTING PROGRAM. The ASME Code (Ref. 4), requires that safety and relief valve tests be performed in accordance with ANSI/ASME OM-1-1987 (Ref. 5). According to Reference 5, the following tests are required:

a. Visual examination;

b. Seat tightness determination;

c. Setpoint pressure determination (lift setting);

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.2.1

This SR verifies that the closure time of each MSIV is within the limit given in Reference 5 and is within that assumed in the accident and containment analyses. The hand switch may be used as the actuation signal to perform this surveillance. This SR also verifies the valve closure time is in accordance with the INSERVICE TESTING PROGRAM. This SR is normally performed upon returning the unit to operation following a refueling outage.

The Frequency is in accordance with the INSERVICE TESTING PROGRAM. This test is allowed to be conducted in MODE 3 with the unit at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

SR 3.7.2.2

This SR verifies that each MSIV can close on an actual or simulated main steam line isolation actuation signal. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This test is allowed to be conducted in MODE 3 with the unit at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

REFERENCES

1. FSAR, Section 10.3.
2. FSAR, Section 6.2.
3. FSAR, Chapter 15.
4. 10 CFR 100.11.
5. Technical Requirements Manual.

BASES

ACTIONS

E.1 and E.2 (continued)

Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 12 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.

SURVEILLANCE REQUIREMENTS

SR 3.7.3.1

This SR verifies that the closure time of each FIV, FCV, and associated bypass valves is within the limit given in Reference 2 and is within that assumed in the accident and containment analyses. This SR also verifies the valve closure time is in accordance with the INSERVICE TESTING PROGRAM. This SR is normally performed upon returning the unit to operation following a refueling outage. This is consistent with RG 1.22 (Ref. 4).

The Frequency for this SR is in accordance with the INSERVICE TESTING PROGRAM. Per Ref. 5, if it is necessary to adjust stem packing to stop packing leakage and if a required stroke test is not practical in the current plant mode, it should be shown by analysis that the packing adjustment is within torque limits specified by the manufacturer for the existing configuration of packing, and that the performance parameters of the valve are not adversely affected. A confirmatory test must be performed at the first available opportunity when plant conditions allow testing. Packing adjustments beyond the manufacturer's limits may not be performed without (1) an engineering analysis and (2) input from the manufacturer, unless tests can be performed after adjustments.

SR 3.7.3.2

This SR verifies that each FIV and associated bypass valve can close on an actual or simulated actuation signal. This Surveillance is normally performed upon returning the unit to operation following a refueling outage.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.7.4.1

To perform a controlled cooldown of the RCS, the ARVs must be able to be opened remotely and throttled through their full range. This SR ensures that the ARVs are tested through a full control cycle at least once per fuel cycle. Performance of inservice testing or use of an ARV during a unit cooldown may satisfy this requirement. Operating experience has shown that these components usually pass the Surveillance when performed at the Inservice Testing Program Frequency. The Frequency is acceptable from a reliability standpoint.

SR 3.7.4.2

The function of the block valve is to isolate a failed open ARV. Cycling the block valve both closed and open demonstrates its capability to perform this function. Performance of inservice testing or use of the block valve during unit cooldown may satisfy this requirement at least once per fuel cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the INSERVICE TESTING PROGRAM Frequency. The Frequency is acceptable from a reliability standpoint.

REFERENCES

1. FSAR, Sections 3.9B, 5A, 9.3 and 10.3.
2. FSAR, Chapter 15.