

B 3.9 REFUELING OPERATIONS

B 3.9.1 Refueling Equipment Interlocks

BASES

BACKGROUND

Refueling equipment interlocks restrict the operation of the refueling equipment or the withdrawal of control rods to reinforce unit procedures in preventing the reactor from achieving criticality during refueling. The refueling interlock circuitry senses the conditions of the refueling equipment and the control rods. Depending on the sensed conditions, interlocks are actuated to prevent the operation of the refueling equipment or the withdrawal of control rods.

GDC 26 of 10 CFR 50, Appendix A, requires that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The control rods, when fully inserted, serve as the system capable of maintaining the reactor subcritical in cold conditions during all fuel movement activities and accidents.

Two channels of instrumentation are provided to sense the position of the refueling platform, the loading of the refueling platform fuel grapple main hoist, and the full insertion of all control rods. Additional inputs are provided for the loading of the refueling platform monorail hoist, the loading of the refueling platform frame-mounted hoist, and the loading of the service platform hoist. With the reactor mode switch in the shutdown or refuel position, the indicated conditions are combined in logic circuits to determine if all restrictions on refueling equipment operations and control rod insertion are satisfied.

A control rod not at its full-in position interrupts power to the refueling equipment to prevent operating the equipment over the reactor core when loaded with a fuel assembly. Conversely, the refueling equipment located over the core and loaded with fuel inserts a control rod withdrawal block in the Reactor Manual Control System to prevent withdrawing a control rod.

The refueling platform has two mechanical switches that open before the platform or any of its hoists are physically located over the reactor vessel. Each hoist load, except the service platform hoist, is sensed by an electronic load

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BASES

BACKGROUND
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cell. The fuel grapple main hoist load signals are inputs to a programmable logic controller (PLC). The PLC performs the associated interlock and load functions. The monorail and frame-mounted hoist load cells input to electronic setpoint modules that perform their associated interlock and load functions. The PLC opens the associated fuel-loaded circuits at a load lighter than the combined weight of a single fuel assembly and inner-most mast section assembly in water. The electronic setpoint modules open the associated fuel-loaded circuits at a load lighter than the weight of a single fuel assembly in water. The service platform hoist has two switches that also open at a load lighter than the weight of a single fuel assembly in water. The refueling interlocks use these indications to prevent operation of the refueling equipment with fuel loaded over the core whenever any control rod is withdrawn, or to prevent control rod withdrawal whenever fuel loaded refueling equipment is over the core (Ref. 2).

APPLICABLE
SAFETY ANALYSES

The refueling interlocks are explicitly assumed in the USAR analysis of the control rod withdrawal or removal error during refueling (Ref. 3). This analysis evaluates the consequences of control rod withdrawal during refueling. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment.

Criticality and, therefore, subsequent prompt reactivity excursions are prevented during the insertion of fuel, provided all control rods are fully inserted during the fuel insertion. The refueling interlocks accomplish this by preventing loading fuel into the core with any control rod withdrawn, or by preventing withdrawal of a rod from the core during fuel loading.

The refueling platform location switches activate at a point outside of the reactor core, such that, with a fuel assembly loaded and a control rod withdrawn, the fuel is not over the core.

Refueling equipment interlocks satisfy Criterion 3 of Reference 4.

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BASES (continued)

LCO

To prevent criticality during refueling, the refueling interlocks associated with the reactor mode switch refuel position ensure that fuel assemblies are not loaded into the core with any control rod withdrawn.

To prevent these conditions from developing, the all-rods-in, the refueling platform position, the refueling platform fuel grapple fuel-loaded, the refueling platform monorail hoist fuel-loaded, the refueling platform frame-mounted hoist fuel-loaded, and the service platform hoist fuel-loaded inputs are required to be OPERABLE. These inputs are combined in logic circuits that provide refueling equipment or control rod blocks to prevent operations that could result in criticality during refueling operations.

APPLICABILITY

In MODE 5, a prompt reactivity excursion could cause fuel damage and subsequent release of radioactive material to the environment. The refueling equipment interlocks protect against prompt reactivity excursions during MODE 5. The interlocks are only required to be OPERABLE during in-vessel fuel movement with refueling equipment associated with the interlocks when the reactor mode switch is in the refuel position. The interlocks are not required when the reactor mode switch is in the shutdown position since a control rod block (LCO 3.3.2.1, "Control Rod Block Instrumentation") ensures control rod withdrawals cannot occur simultaneously with in-vessel fuel movements.

In MODES 1, 2, 3, and 4, the reactor pressure vessel head is on, and no fuel loading activities are possible. Therefore, the refueling interlocks are not required to be OPERABLE in these MODES.

ACTIONS

A.1, A.2.1, and A.2.2

With one or more of the required refueling equipment interlocks inoperable, the unit must be placed in a condition in which the LCO does not apply or is not necessary. This can be performed by ensuring fuel assemblies are not moved in the reactor vessel or by ensuring that the control rods are inserted and cannot be withdrawn. Therefore, Required Action A.1 requires that in-vessel fuel movement with the affected refueling equipment must be immediately suspended. This action ensures that operations are not performed with equipment

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BASES

ACTIONS

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

that would potentially not be blocked from unacceptable operations (e.g., loading fuel into a cell with a control rod withdrawn). Suspension of in-vessel fuel movement shall not preclude completion of movement of a component to a safe position. Alternately, Required Actions A.2.1 and A.2.2 require that a control rod withdrawal block be inserted and that all control rods are subsequently verified to be fully inserted in core cells containing one or more fuel assemblies. Required Action A.2.1 ensures that no control rods can be withdrawn. This action ensures that control rods cannot be inappropriately withdrawn since an electrical or hydraulic block to control rod withdrawal is in place. Required Action A.2.2 is normally performed after placing the rod withdrawal block in effect and provides a verification that all control rods in core cells containing one or more fuel assemblies are fully inserted. Like Required Action A.1, Required Actions A.2.1 and A.2.2 ensure that unacceptable operations are blocked (e.g., loading fuel into a core cell with the control rod withdrawn).

SURVEILLANCE REQUIREMENTS

SR 3.9.1.1

Performance of a CHANNEL FUNCTIONAL TEST demonstrates each required refueling equipment interlock will function properly when a simulated or actual signal indicative of a required condition is injected into the logic. The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping, or total channel steps so that the entire channel is tested.

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

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
2. USAR, Section 7.1.4.
3. USAR, Section 15.4.1.1.
4. 10 CFR 50.36(c)(2)(ii).

B 3.9 REFUELING OPERATIONS

B 3.9.2 Refuel Position One-Rod-Out Interlock

BASES

BACKGROUND

The refuel position one-rod-out interlock restricts the movement of control rods to reinforce unit procedures that prevent the reactor from becoming critical during refueling operations. During refueling operations, no more than one control rod is permitted to be withdrawn.

GDC 26 of 10 CFR 50, Appendix A, requires that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The control rods serve as the system capable of maintaining the reactor subcritical in cold conditions.

The refuel position one-rod-out interlock prevents the selection of a second control rod for movement when any other control rod is not fully inserted (Ref. 2). It is a logic circuit that has redundant channels. It uses the all-rods-in signal (from the control rod full-in position indicators discussed in LCO 3.9.4, "Control Rod Position Indication") and a rod selection signal (from the Reactor Manual Control System).

This Specification ensures that the performance of the refuel position one-rod-out interlock in the event of a Design Basis Accident meets the assumptions used in the safety analysis of Reference 3.

APPLICABLE SAFETY ANALYSES

The refuel position one-rod-out interlock is explicitly assumed in the USAR analysis of the control rod withdrawal error during refueling (Ref. 3). This analysis evaluates the consequences of control rod withdrawal during refueling. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment.

The refuel position one-rod-out interlock and adequate SDM (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") prevent criticality by preventing withdrawal of more than one control rod. With

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BASES

APPLICABLE
SAFETY ANALYSES
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one control rod withdrawn, the core will remain subcritical, thereby preventing any prompt critical excursion.

The refuel position one-rod-out interlock satisfies Criterion 3 of Reference 4.

LCO

To prevent criticality during MODE 5, the refuel position one-rod-out interlock ensures no more than one control rod may be withdrawn. Both channels of the refuel position one-rod-out interlock are required to be OPERABLE and the reactor mode switch must be locked in the refuel position to support the OPERABILITY of these channels.

APPLICABILITY

In MODE 5, with the reactor mode switch in the refuel position, the OPERABLE refuel position one-rod-out interlock provides protection against prompt reactivity excursions.

In MODES 1, 2, 3, and 4, the refuel position one-rod-out interlock is not required to be OPERABLE and is bypassed. In MODES 1 and 2, the Reactor Protection System (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation") and the control rods (LCO 3.1.3, "Control Rod OPERABILITY") provide mitigation of potential reactivity excursions. In MODES 3, 4, and 5 with the reactor mode switch in the shutdown position, a control rod block (LCO 3.3.2.1, "Control Rod Block Instrumentation") ensures all control rods are inserted, thereby preventing criticality during shutdown conditions.

ACTIONS

A.1 and A.2

With the refuel position one-rod-out interlock inoperable, the refueling interlocks are not capable of preventing more than one control rod from being withdrawn. This condition may lead to criticality.

Control rod withdrawal must be immediately suspended, and action must be immediately initiated to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Action must continue until all such

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BASES

ACTIONS

A.1 and A.2 (continued)

control rods are fully inserted. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and, therefore, do not have to be inserted.

SURVEILLANCE
REQUIREMENTS

SR 3.9.2.1

Proper functioning of the refueling position one-rod-out interlock requires the reactor mode switch to be in Refuel. During control rod withdrawal in MODE 5, improper positioning of the reactor mode switch could, in some instances, allow improper bypassing of required interlocks. Therefore, this Surveillance imposes an additional level of assurance that the refueling position one-rod-out interlock will be OPERABLE when required. By "locking" the reactor mode switch in the proper position (i.e., removing the reactor mode switch key from the console while the reactor mode switch is positioned in refuel), an additional administrative control is in place to preclude operator errors from resulting in unanalyzed operation.

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

SR 3.9.2.2

Performance of a CHANNEL FUNCTIONAL TEST on each channel demonstrates the associated refuel position one-rod-out interlock will function properly when a simulated or actual signal indicative of a required condition is injected into the logic. The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping, or total channel steps so that the entire channel is tested. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program. To perform the required testing, the applicable condition must be entered (i.e., a control rod must be withdrawn from its full-in position). Therefore, SR 3.9.2.2 has been modified by a Note that states the CHANNEL FUNCTIONAL TEST is not required to be performed until 1 hour after any control rod is withdrawn.

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| REFERENCES | 1. 10 CFR 50, Appendix A, GDC 26. |
| | 2. USAR, Section 7.1.4. |
| | 3. USAR, Section 15.4.1.1. |
| | 4. 10 CFR 50.36(c)(2)(ii). |
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B 3.9 REFUELING OPERATIONS

B 3.9.3 Control Rod Position

BASES

BACKGROUND

Control rods provide the capability to maintain the reactor subcritical under all conditions and to limit the potential amount and rate of reactivity increase caused by a malfunction in the Control Rod Drive System. During refueling, movement of control rods is limited by the refueling interlocks (LCO 3.9.1, "Refueling Equipment Interlocks" and LCO 3.9.2, "Refuel Position One-Rod-Out Interlock") or the control rod block with the reactor mode switch in the shutdown position (LCO 3.3.2.1, "Control Rod Block Instrumentation").

GDC 26 of 10 CFR 50, Appendix A, requires that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The control rods serve as the system capable of maintaining the reactor subcritical in cold conditions.

The refueling interlocks allow a single control rod to be withdrawn at any time unless fuel is being loaded into the core. To preclude loading fuel assemblies into the core with a control rod withdrawn, all control rods must be fully inserted. This prevents the reactor from achieving criticality during refueling operations.

APPLICABLE SAFETY ANALYSES

Prevention and mitigation of prompt reactivity excursions during refueling are provided by the refueling interlocks (LCO 3.9.1 and LCO 3.9.2), the SDM (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"), the intermediate range monitor neutron flux scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"), and the control rod block instrumentation (LCO 3.3.2.1).

The safety analysis of the control rod withdrawal error during refueling in the USAR (Ref. 2) assumes the functioning of the refueling interlocks and adequate SDM. Additionally, prior to fuel reload, all control rods must be fully inserted to minimize the probability of an inadvertent criticality.

Control rod position satisfies Criterion 3 of Reference 3.

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BASES (continued)

LCO

All control rods must be fully inserted during applicable refueling conditions to minimize the probability of an inadvertent criticality during refueling.

APPLICABILITY

During MODE 5, loading fuel into core cells with control rods withdrawn may result in inadvertent criticality. Therefore, the control rods must be inserted before loading fuel into a core cell. All control rods must be inserted before loading fuel to ensure that a fuel loading error does not result in loading fuel into a core cell with the control rod withdrawn.

In MODES 1, 2, 3, and 4, the reactor pressure vessel head is on, and no fuel loading activities are possible. Therefore, this Specification is not applicable in these MODES.

ACTIONS

A.1

With all control rods not fully inserted during the applicable conditions, an inadvertent criticality could occur that is not analyzed in the USAR. All fuel loading operations must be immediately suspended. Suspension of these activities shall not preclude completion of movement of a component to a safe position.

SURVEILLANCE
REQUIREMENTS

SR 3.9.3.1

During refueling, to ensure that the reactor remains subcritical, all control rods must be fully inserted prior to and during fuel loading. Periodic checks of the control rod position ensure this condition is maintained.

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

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
 2. USAR, Section 15.4.1.1.
 3. 10 CFR 50.36(c)(2)(ii).
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B 3.9 REFUELING OPERATIONS

B 3.9.4 Control Rod Position Indication

BASES

BACKGROUND

The full-in position indication channels for each control rod provide information necessary to the refueling interlocks to prevent inadvertent criticalities during refueling operations. During refueling, the refueling interlocks (LCO 3.9.1, "Refueling Equipment Interlocks" and LCO 3.9.2, "Refuel Position One-Rod-Out Interlock") use the full-in position indication channels to limit the operation of the refueling equipment and the movement of the control rods. Three full-in position indication channels are provided for each control rod (switch S51 and S52 wired in parallel for 00 readout and switch S00, beyond full-in). All three full-in position indication channels provide input to the all-rods-in logic. If any one of the three full-in position indication channels indicates full-in, the all-rods-in logic will receive a full-in signal for that control rod. The absence of all full-in position indication channels signal for any control rod removes the all-rods-in permissive for the refueling equipment interlocks and prevents fuel loading. Also, this condition causes the refuel position one-rod-out interlock to not allow the selection of any other control rod. The all-rods-in logic provides two signals, one to each of the two Reactor Manual Control System rod block logic circuits.

GDC 26 of 10 CFR 50, Appendix A, requires that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The control rods serve as the system capable of maintaining the reactor subcritical in cold conditions.

APPLICABLE SAFETY ANALYSES

Prevention and mitigation of prompt reactivity excursions during refueling are provided by the refueling interlocks (LCO 3.9.1 and LCO 3.9.2), the SDM (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"), the intermediate range monitor neutron flux scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"), and the control rod block instrumentation (LCO 3.3.2.1, "Control Rod Block Instrumentation").

The safety analysis for the control rod withdrawal or removal error during refueling (Ref. 2) assumes the

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APPLICABLE
SAFETY ANALYSES
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functioning of the refueling interlocks and adequate SDM. The full-in position indication channel is required to be OPERABLE so that the refueling interlocks can ensure that fuel cannot be loaded with any control rod withdrawn and that no more than one control rod can be withdrawn at a time.

Control rod position indication satisfies Criterion 3 of Reference 3.

LCO

Each control rod full-in position indication channel for each control rod must be OPERABLE to provide the required inputs to the refueling interlocks. A channel is OPERABLE if it provides correct position indication to the refueling equipment interlock all-rods-in logic (LCO 3.9.1) and the refuel position one-rod-out interlock logic (LCO 3.9.2).

APPLICABILITY

During MODE 5, the control rods must have OPERABLE full-in position indication channels to ensure the applicable refueling interlocks will be OPERABLE.

In MODES 1 and 2, requirements for control rod position are specified in LCO 3.1.3, "Control Rod OPERABILITY." In MODES 3 and 4, with the reactor mode switch in the shutdown position, a control rod block (LCO 3.3.2.1) ensures all control rods are inserted, thereby preventing criticality during shutdown conditions.

ACTIONS

A Note has been provided to modify the ACTIONS related to control rod position indication channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable control rod position indication channels provide appropriate compensatory measures for separate inoperable channels. As such, this Note has been provided, which allows separate Condition entry for each inoperable required control rod position indication channel.

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BASES

ACTIONS
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A.1.1, A.1.2, A.1.3, A.2.1, and A.2.2

With one or more full-in position indication channels inoperable, compensating actions must be taken to protect against potential reactivity excursions from fuel assembly insertions or control rod withdrawals. This may be accomplished by immediately suspending in-vessel fuel movement and control rod withdrawal, and immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies. Actions must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted. Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and, therefore, do not have to be inserted. Suspension of in-vessel fuel movements and control rod withdrawal shall not preclude moving a component to a safe position.

Alternatively, actions may be immediately initiated to fully insert the control rod(s) associated with the inoperable full-in position indicators(s) and to disarm (electrically or hydraulically) the drive(s) to ensure that the control rod is not withdrawn. A control rod can be hydraulically disarmed by closing the drive water and exhaust water isolation valves. A control rod can be electrically disarmed by disconnecting power from all four directional control valve solenoids. Actions must continue until all associated control rods are fully inserted and drives are disarmed. Under these conditions (control rod fully inserted and disarmed), an inoperable full-in channel may be bypassed to allow refueling operations to proceed. An alternate method must be used to ensure the control rod is fully inserted (e.g., use the "00" notch position indication).

SURVEILLANCE
REQUIREMENTS

SR 3.9.4.1

The full-in position indication channels provide input to the one-rod-out interlock and other refueling interlocks that require an all-rods-in permissive. The interlocks are activated when the full-in position indication for any control rod is not present, since this indicates that all rods are not fully inserted. Therefore, testing of the full-in position indication channels is performed to ensure that when a control rod is withdrawn, the full-in position indication is not present. This is performed by verifying

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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.4.1 (continued)

both the absence of a full-in position indication and the absence of an "XX" indication for the control rod on the four control rod group display, when the control rod is not full-in. A full-in position indication channel is considered inoperable even with the control rod fully inserted, if it would continue to indicate full-in with the control rod withdrawn. Performing the SR each time a control rod is withdrawn from the full-in position is considered adequate because of the procedural controls on control rod withdrawals and the visual indications available in the control room to alert the operator to control rods not fully inserted.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
 2. USAR, Section 15.4.1.1.
 3. 10 CFR 50.36(c)(2)(ii).
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B 3.9 REFUELING OPERATIONS

B 3.9.5 Control Rod OPERABILITY – Refueling

BASES

BACKGROUND

Control rods are components of the Control Rod Drive (CRD) System, the primary reactivity control system for the reactor. In conjunction with the Reactor Protection System, the CRD System provides the means for the reliable control of reactivity changes during refueling operation. In addition, the control rods provide the capability to maintain the reactor subcritical under all conditions and to limit the potential amount and rate of reactivity increase caused by a malfunction in the CRD System.

GDC 26 of 10 CFR 50, Appendix A, requires that one of the two required independent reactivity control systems be capable of holding the reactor core subcritical under cold conditions (Ref. 1). The CRD System is the system capable of maintaining the reactor subcritical in cold conditions.

APPLICABLE SAFETY ANALYSES

Prevention and mitigation of prompt reactivity excursions during refueling are provided by refueling interlocks (LCO 3.9.1, "Refueling Equipment Interlocks" and LCO 3.9.2, "Refuel Position One-Rod-Out Interlock"), the SDM (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"), the intermediate range monitor neutron flux scram (LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation"), and the control rod block instrumentation (LCO 3.3.2.1, "Control Rod Block Instrumentation").

The safety analysis for the control rod withdrawal error during refueling (Ref. 2) evaluates the consequences of control rod withdrawal or removal during refueling and also fuel assembly insertion with a control rod withdrawn. A prompt reactivity excursion during refueling could potentially result in fuel failure with subsequent release of radioactive material to the environment. Control rod scram provides protection should a prompt reactivity excursion occur.

Control rod OPERABILITY during refueling satisfies Criterion 3 of Reference 3.

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BASES (continued)

LCO	Each withdrawn control rod must be OPERABLE. The withdrawn control rod is considered OPERABLE if the scram accumulator pressure is ≥ 940 psig and the control rod is capable of being automatically inserted upon receipt of a scram signal. Inserted control rods have already completed their reactivity control function, and therefore, are not required to be OPERABLE.
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APPLICABILITY	<p>During MODE 5, withdrawn control rods must be OPERABLE to ensure that in a scram the control rods will insert and provide the required negative reactivity to maintain the reactor subcritical.</p> <p>For MODES 1 and 2, control rod requirements are found in LCO 3.1.2, "Reactivity Anomalies," LCO 3.1.3, "Control Rod OPERABILITY," LCO 3.1.4, "Control Rod Scram Times," and LCO 3.1.5, "Control Rod Scram Accumulators." During MODES 3 and 4, control rods are not able to be withdrawn since the reactor mode switch is in shutdown and a control rod block is applied. This provides adequate requirements for control rod OPERABILITY during these conditions.</p>
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ACTIONS	<p><u>A.1</u></p> <p>With one or more withdrawn control rods inoperable, action must be immediately initiated to fully insert the inoperable control rod(s). Inserting the control rod(s) ensures that the shutdown and scram capabilities are not adversely affected. Actions must continue until the inoperable control rod(s) is fully inserted.</p>
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SURVEILLANCE REQUIREMENTS	<p><u>SR 3.9.5.1 and SR 3.9.5.2</u></p> <p>During MODE 5, the OPERABILITY of control rods is primarily required to ensure that a withdrawn control rod will automatically insert if a signal requiring a reactor shutdown occurs. Because no explicit analysis exists for automatic shutdown during refueling, the shutdown function is satisfied if the withdrawn control rod is capable of automatic insertion and the associated CRD scram accumulator pressure is ≥ 940 psig.</p>
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.5.1 and SR 3.9.5.2 (continued)

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

SR 3.9.5.1 is modified by a Note that allows 7 days after withdrawal of the control rod to perform the Surveillance. This acknowledges that the control rod must first be withdrawn before performance of the Surveillance, and therefore avoids potential conflicts with SR 3.0.1.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
 2. USAR, Section 15.4.1.1.
 3. 10 CFR 50.36(c)(2)(ii).
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B 3.9 REFUELING OPERATIONS

B 3.9.6 Reactor Pressure Vessel (RPV) Water Level – Irradiated Fuel

BASES

BACKGROUND

The movement of irradiated fuel assemblies within the RPV requires a minimum water level of 22 ft 3 inches above the top of the RPV flange. During refueling, this maintains a sufficient water level in the reactor vessel cavity and spent fuel storage pool. Sufficient water is necessary to retain iodine fission product activity in the water in the event of a fuel handling accident (Refs. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to $\leq 25\%$ of 10 CFR 50.67 limits, as provided by the guidance of Reference 3.

APPLICABLE SAFETY ANALYSES

During movement of irradiated fuel assemblies the water level in the RPV is an initial condition design parameter in the analysis of a fuel handling accident in containment postulated by Regulatory Guide 1.183 (Ref. 1), which states: "If the depth of water above the damaged fuel is 23 feet or greater, the decontamination factors for the elemental and organic species are 500 [subsequently corrected to 285 by RIS 2006-04 (Ref. 7)] and 1, respectively, giving an overall effective decontamination factor of 200 (i.e., 99.5% of the total iodine released from the damaged rods is retained by the water). This difference in decontamination factors for elemental (99.85%) and organic (0.15%) species results in the iodine above the water being composed of 57% elemental and 43% organic species. If the depth of water is not 23 feet, the decontamination factor will have to be determined on a case by case method." In accordance with Regulatory Guide 1.183, the fraction of fission product inventory in the fuel pellet to cladding gap is 10% for Kr-85, 8% for I-131, and 5% for other noble gases and halogens.

Analysis of the fuel handling accident inside containment is described in Reference 2. With a minimum water level of 22 ft 3 inches, the adjusted elemental iodine decontamination factor is 175. Assuming a minimum decay time of 24 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling accident is adequately captured by the water, and that offsite doses are maintained within allowable limits (Ref. 5). While the worst case assumptions include the dropping of the irradiated fuel assembly being handled onto the reactor core, the possibility exists of the dropped assembly striking the RPV flange and releasing fission products. Therefore, the minimum depth for water coverage to ensure

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APPLICABLE
SAFETY ANALYSES
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acceptable radiological consequences is specified from the RPV flange. Since the worst case event results in failed fuel assemblies seated in the core, as well as the dropped assembly, dropping an assembly on the RPV flange will result in reduced releases of fission gases.

RPV water level satisfies Criterion 2 of Reference 6.

LCO

A minimum water level of 22 ft 3 inches above the top of the RPV flange is required to ensure that the radiological consequences of a postulated fuel handling accident are within acceptable limits, as provided by the guidance of Reference 3.

APPLICABILITY

LCO 3.9.6 is applicable when moving irradiated fuel assemblies within the RPV. The LCO minimizes the possibility of a fuel handling accident in containment that is beyond the assumptions of the safety analysis. If irradiated fuel is not present within the RPV, there can be no significant radioactivity release as a result of a postulated fuel handling accident. Requirements for handling of new fuel assemblies or control rods (where water depth to the RPV flange is not of concern) are covered by LCO 3.9.7, "RPV Water Level – New Fuel or Control Rods." Requirements for fuel handling accidents in the spent fuel storage pool are covered by LCO 3.7.6, "Spent Fuel Storage Pool Water Level."

ACTIONS

A.1

If the water level is < 22 ft 3 inches above the top of the RPV flange, all operations involving movement of irradiated fuel assemblies within the RPV shall be suspended immediately to ensure that a fuel handling accident cannot occur. The suspension of irradiated fuel movement shall not preclude completion of movement of a component to a safe position.

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BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.9.6.1

Verification of a minimum water level of 22 ft 3 inches above the top of the RPV flange ensures that the design basis for the postulated fuel handling accident analysis during refueling operations is met. Water at the required level limits the consequences of damaged fuel rods, which are postulated to result from a fuel handling accident in containment (Ref. 2).

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

REFERENCES

1. Regulatory Guide 1.183, July 2000.
 2. USAR, Section 15.7.4.
 3. NUREG-0800, Section 15.0.1.
 4. USAR, Table 15.7-9.
 5. 10 CFR 50.67, "Accident Source Term."
 6. 10 CFR 50.36(c)(2)(ii).
 7. Regulatory Issue Summary (RIS) 2006-04, March 7, 2006.
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B 3.9 REFUELING OPERATIONS

B 3.9.7 Reactor Pressure Vessel (RPV) Water Level – New Fuel or Control Rods

BASES

BACKGROUND

The movement of new fuel assemblies or handling of control rods within the RPV when fuel assemblies seated within the reactor vessel are irradiated requires a minimum water level of 22 ft 3 inches above the top of irradiated fuel assemblies seated within the RPV. During refueling, this maintains a sufficient water level above the irradiated fuel. Sufficient water is necessary to retain iodine fission product activity in the water in the event of a fuel handling accident (Refs. 1 and 2). Sufficient iodine activity would be retained to limit offsite doses from the accident to $\leq 25\%$ of 10 CFR 50.67 limits, as provided by the guidance of Reference 3.

APPLICABLE SAFETY ANALYSES

During movement of new fuel assemblies or handling of control rods over irradiated fuel assemblies, the water level in the RPV is an initial condition design parameter in the analysis of a fuel handling accident in containment postulated by Regulatory Guide 1.183 (Ref. 1), which states: "If the depth of water above the damaged fuel is 23 feet or greater, the decontamination factors for the elemental and organic species are 500 [subsequently corrected to 285 by RIS 2006-04 (Ref. 7)] and 1, respectively, giving an overall effective decontamination factor of 200 (i.e., 99.5% of the total iodine released from the damaged rods is retained by the water). This difference in decontamination factors for elemental (99.85%) and organic (0.15%) species results in the iodine above the water being composed of 57% elemental and 43% organic species. If the depth of water is not 23 feet, the decontamination factor will have to be determined on a case by case method." In accordance with Regulatory Guide 1.183, the fraction of fission product inventory in the fuel pellet to cladding gap is 10% for Kr-85, 8% for I-131, and 5% for other noble gases and halogens.

Analysis of the fuel handling accident inside containment is described in Reference 2. With a minimum water level of 22 ft 3 inches, the adjusted elemental iodine decontamination factor is 175. Assuming a minimum decay time of 24 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling accident is adequately captured by the water, and that offsite doses are maintained within allowable limits (Ref. 5). The related assumptions include the worst case dropping of an irradiated fuel assembly onto the reactor core loaded with irradiated fuel assemblies.

(continued)

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

RPV water level satisfies Criterion 2 of Reference 6.

LCO

A minimum water level of 22 ft 3 inches above the top of irradiated fuel assemblies seated within the RPV is required to ensure that the radiological consequences of a postulated fuel handling accident are within acceptable limits, as provided by the guidance of Reference 3.

APPLICABILITY

LCO 3.9.7 is applicable when moving new fuel assemblies or handling control rods (i.e., movement with other than the normal control rod drive) when irradiated fuel assemblies are seated within the RPV. The LCO minimizes the possibility of a fuel handling accident in containment that is beyond the assumptions of the safety analysis. If irradiated fuel is not present within the RPV, there can be no significant radioactivity release as a result of a postulated fuel handling accident. Requirements for fuel handling accidents in the spent fuel storage pool are covered by LCO 3.7.6, "Spent Fuel Storage Pool Water Level." Requirements for handling irradiated fuel over the RPV are covered by LCO 3.9.6, "Reactor Pressure Vessel (RPV) Water Level – Irradiated Fuel."

ACTIONS

A.1

If the water level is < 22 ft 3 inches above the top of irradiated fuel assemblies seated within the RPV, all operations involving movement of new fuel assemblies and handling of control rods within the RPV shall be suspended immediately to ensure that a fuel handling accident cannot occur. The suspension of fuel movement and control rod handling shall not preclude completion of movement of a component to a safe position.

SURVEILLANCE
REQUIREMENTS

SR 3.9.7.1

Verification of a minimum water level of 22 ft 3 inches above the top of the irradiated fuel assemblies seated within the RPV ensures that the design basis for the postulated fuel handling accident analysis during refueling

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.9.7.1 (continued)

operations is met. Water at the required level limits the consequences of damaged fuel rods, which are postulated to result from a fuel handling accident in containment (Ref. 2).

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

REFERENCES

1. Regulatory Guide 1.183, July 2000.
 2. USAR, Section 15.7.4.
 3. NUREG-0800, Section 15.0.1.
 4. USAR, Table 15.7-9.
 5. 10 CFR 50.67, "Accident Source Term."
 6. 10 CFR 50.36(c)(2)(ii).
 7. Regulatory Issue Summary (RIS) 2006-04, March 7, 2006.
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B 3.9 REFUELING OPERATIONS

B 3.9.8 Residual Heat Removal (RHR) – High Water Level

BASES

BACKGROUND

The purpose of the RHR System in MODE 5 is to remove decay heat and sensible heat from the reactor coolant, as required by GDC 34 (Ref. 1). Each of the two shutdown cooling loops of the RHR System can provide the required decay heat removal. Each loop consists of one motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after it has been cooled by circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Service Water (SW) System. The RHR shutdown cooling mode is manually controlled.

In addition to the RHR subsystems, the volume of water above the reactor pressure vessel (RPV) flange provides a heat sink for decay heat removal.

APPLICABLE SAFETY ANALYSES

With the unit in MODE 5, the RHR Shutdown Cooling System is not required to mitigate any events or accidents evaluated in the safety analyses. The RHR Shutdown Cooling System is required for removing decay heat to maintain the temperature of the reactor coolant.

The RHR System satisfies Criterion 4 of Reference 2.

LCO

Only one RHR shutdown cooling subsystem is required to be OPERABLE and in operation in MODE 5 with irradiated fuel in the RPV and the water level ≥ 22 ft 3 inches above the RPV flange. Only one subsystem is required to be OPERABLE because the volume of water above the RPV flange provides backup decay heat removal capability.

An OPERABLE RHR shutdown cooling subsystem consists of an RHR pump, a heat exchanger, the necessary portions of the SW System and Ultimate Heat Sink capable of providing cooling to the heat exchanger and the RHR pump seal cooler, valves, piping, instruments, and controls to ensure an OPERABLE flow path. Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.

(continued)

BASES

LCO
(continued)

Additionally, each RHR shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. Operation (either continuous or intermittent) of one subsystem can maintain and reduce the reactor coolant temperature as required. However, to ensure adequate core flow to allow for accurate average reactor coolant temperature monitoring, nearly continuous operation is required. A Note is provided to allow a 2 hour exception for the operating subsystem to not be in operation every 8 hours. This is permitted because the core heat generation can be low enough and the heatup rate slow enough to allow some changes to the RHR subsystem or other operations requiring RHR flow interruption.

APPLICABILITY

One RHR shutdown cooling subsystem must be OPERABLE and in operation in MODE 5, with irradiated fuel in the RPV and with the water level \geq 22 ft 3 inches above the top of the RPV flange, to provide decay heat removal. RHR shutdown cooling subsystem requirements in other MODES are covered by LCOs in Section 3.4, Reactor Coolant System (RCS). RHR shutdown cooling subsystem requirements in MODE 5, with irradiated fuel in the RPV and with the water level $<$ 22 ft 3 inches above the RPV flange, are given in LCO 3.9.9, "Residual Heat Removal (RHR) – Low Water Level."

ACTIONS

A.1

With no RHR shutdown cooling subsystem OPERABLE, an alternate method of decay heat removal must be provided within 1 hour. In this condition, the volume of water above the RPV flange provides adequate capability to remove decay heat from the reactor core. However, the overall reliability is reduced because loss of water level could result in reduced decay heat removal capability. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities. Furthermore, verification of the functional availability of the alternate method must be reconfirmed every 24 hours thereafter. This will ensure continued heat removal capability.

Alternate decay heat removal methods are available to the operators for review and preplanning in the unit operating procedures. The required cooling capacity of the alternate

(continued)

BASES

ACTIONS

A.1 (continued)

method should be ensured by verifying (by calculation or demonstration) its capability to maintain or reduce temperature. For example, this may include the use of the Spent Fuel Pool Cooling and Cleanup System, Alternate Decay Heat Removal System, or the Reactor Water Cleanup System operating with the regenerative heat exchanger bypassed or in combination with the Control Rod Drive System or Condensate/Feed System. The method used to remove the decay heat should be the most prudent choice based on unit conditions.

B.1, B.2, B.3, and B.4

If no RHR shutdown cooling subsystem is OPERABLE and an alternate method of decay heat removal is not available in accordance with Required Action A.1, actions shall be taken immediately to suspend operations involving an increase in reactor decay heat load by suspending the loading of irradiated fuel assemblies into the RPV.

Additional actions are required to minimize any potential fission product release to the environment. This includes ensuring secondary containment is OPERABLE, one standby gas treatment subsystem is OPERABLE, and secondary containment isolation capability is available in each associated penetration flow path not isolated that is assumed to be isolated to mitigate radioactive releases (i.e., one secondary containment isolation valve and associated instrumentation are OPERABLE or other acceptable administrative controls to assure isolation capability. These administrative controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a need for secondary containment isolation is indicated). This may be performed as an administrative check, by examining logs or other information to determine whether the components are out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it

(continued)

BASES

ACTIONS

B.1, B.2, B.3, and B.4 (continued)

must be restored to OPERABLE status. In this case, a surveillance may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

C.1 and C.2

If no RHR shutdown cooling subsystem is in operation, an alternate method of coolant circulation is required to be established within 1 hour. The Completion Time is modified such that 1 hour is applicable separately for each occurrence involving a loss of coolant circulation.

During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem), the reactor coolant temperature must be periodically monitored to ensure proper functioning of the alternate method. The once per hour Completion Time is deemed appropriate.

SURVEILLANCE
REQUIREMENTS

SR 3.9.8.1

This Surveillance demonstrates that the required RHR shutdown cooling subsystem is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.9.8.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR Shutdown Cooling subsystems and may also prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.9.8.2 (continued)

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plant and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

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<p>SURVEILLANCE REQUIREMENTS (continued) Frequency</p>	<p><u>SR 3.9.8.2</u> (continued)</p> <p>The Surveillance Frequency is controlled under the Surveillance Control Program.</p>
<p>REFERENCES</p>	<ol style="list-style-type: none"> 1. 10 CFR 50, Appendix A, GDC 34. 2. 10 CFR 50.36(c)(2)(ii).

B 3.9 REFUELING OPERATIONS

B 3.9.9 Residual Heat Removal (RHR) – Low Water Level

BASES

BACKGROUND

The purpose of the RHR System in MODE 5 is to remove decay heat and sensible heat from the reactor coolant, as required by GDC 34 (Ref. 1). Each of the two shutdown cooling loops of the RHR System can provide the required decay heat removal. Each loop consists of one motor driven pump, a heat exchanger, and associated piping and valves. Both loops have a common suction from the same recirculation loop. Each pump discharges the reactor coolant, after it has been cooled by circulation through the respective heat exchanger, to the reactor via the associated recirculation loop. The RHR heat exchangers transfer heat to the Service Water (SW) System. The RHR shutdown cooling mode is manually controlled.

APPLICABLE SAFETY ANALYSES

With the unit in MODE 5, the RHR Shutdown Cooling System is not required to mitigate any events or accidents evaluated in the safety analyses. The RHR Shutdown Cooling System is required for removing decay heat to maintain the temperature of the reactor coolant.

The RHR System satisfies Criterion 4 of Reference 2.

LCO

In MODE 5 with irradiated fuel in the reactor pressure vessel (RPV) and with the water level < 22 ft 3 inches above the RPV flange both RHR shutdown cooling subsystems must be OPERABLE and one RHR shutdown cooling subsystem must be in operation.

An OPERABLE RHR shutdown cooling subsystem consists of an RHR pump, a heat exchanger, the necessary portions of the SW System and Ultimate Heat Sink capable of providing cooling to the heat exchanger and the RHR pump seal cooler, valves, piping, instruments, and controls to ensure an OPERABLE flow path. Management of gas voids is important to RHR Shutdown Cooling System OPERABILITY.

Additionally, each RHR shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat. Operation (either continuous or intermittent) of one subsystem can maintain and reduce the reactor coolant

(continued)

BASES

LCO (continued)	temperature as required. However, to ensure adequate core flow to allow for accurate average reactor coolant temperature monitoring, nearly continuous operation is required. A Note is provided to allow a 2 hour exception for the operating subsystem to not be in operation every 8 hours. This is permitted because the core heat generation can be low enough and the heatup rate slow enough to allow some changes to the RHR subsystem or other operations requiring RHR flow interruption.
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APPLICABILITY	Two RHR shutdown cooling subsystems are required to be OPERABLE and one RHR shutdown cooling subsystem must be in operation in MODE 5, with irradiated fuel in the RPV and with the water level < 22 ft 3 inches above the top of the RPV flange, to provide decay heat removal. RHR shutdown cooling subsystem requirements in other MODES are covered by LCOs in Section 3.4, Reactor Coolant System (RCS). RHR shutdown cooling subsystem requirements in MODE 5, with irradiated fuel in the RPV and the water level \geq 22 ft 3 inches above the RPV flange, are given in LCO 3.9.8, "Residual Heat Removal (RHR) – High Water Level."
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ACTIONS	<p><u>A.1</u></p> <p>With one of the two RHR shutdown cooling subsystems inoperable, the remaining subsystem is capable of providing the required decay heat removal. However, the overall reliability is reduced. Therefore, an alternate method of decay heat removal must be provided. With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities. Furthermore, verification of the functional availability of these alternate method(s) must be reconfirmed every 24 hours thereafter. This will ensure continued heat removal capability.</p>
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(continued)

BASES

ACTIONS

A.1 (continued)

Alternate decay heat removal methods are available to the operators for review and preplanning in the unit operating procedures. The required cooling capacity of the alternate method(s) should be ensured by verifying (by calculation or demonstration) their capability to maintain or reduce temperature. For example, this may include the use of the Spent Fuel Pool Cooling and Cleanup System, Alternate Decay Heat Removal System, or the Reactor Water Cleanup System operating with the regenerative heat exchanger bypassed or in combination with the Control Rod Drive System or Condensate/Feed System. The method used to remove decay heat should be the most prudent choice based on unit conditions.

Condition A is modified by a Note allowing separate Condition entry for each inoperable RHR shutdown cooling subsystem. This is acceptable since the Required Actions for this Condition provide appropriate compensatory actions for each inoperable RHR shutdown cooling subsystem. Complying with the Required Actions allow for continued operation. A subsequent inoperable RHR shutdown cooling subsystem is governed by subsequent entry into the Condition and application of the Required Actions.

B.1, B.2, and B.3

With the required decay heat removal subsystem(s) inoperable and the required alternate method(s) of decay heat removal not available in accordance with Required Action A.1, additional actions are required to minimize any potential fission product release to the environment. This includes ensuring secondary containment is OPERABLE, one standby gas treatment subsystem is OPERABLE, and secondary containment isolation capability is available in each associated penetration flow path not isolated that is assumed to be isolated to mitigate radioactive releases (i.e., one secondary containment isolation valve and associated instrumentation are OPERABLE or other acceptable administrative controls to assure isolation capability. These administrative controls consist of stationing a dedicated operator, who is in continuous communication with the control room, at the controls of the isolation device. In this way, the penetration can be rapidly isolated when a

(continued)

BASES

ACTIONS

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

need for secondary containment isolation is indicated). This may be performed as an administrative check, by examining logs or other information to determine whether the components are out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, a surveillance may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

C.1 and C.2

If no RHR shutdown cooling subsystem is in operation, an alternate method of coolant circulation is required to be established within 1 hour. The Completion Time is modified such that the 1 hour is applicable separately for each occurrence involving a loss of coolant circulation.

During the period when the reactor coolant is being circulated by an alternate method (other than by the required RHR shutdown cooling subsystem), the reactor coolant temperature must be periodically monitored to ensure proper function of the alternate method. The once per hour Completion Time is deemed appropriate.

SURVEILLANCE
REQUIREMENTS

SR 3.9.9.1

This Surveillance demonstrates that one RHR shutdown cooling subsystem is in operation and circulating reactor coolant. The required flow rate is determined by the flow rate necessary to provide sufficient decay heat removal capability. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.9.9.2

RHR Shutdown Cooling System piping and components have the potential to develop voids and pockets of entrained gases. Preventing and managing gas intrusion and accumulation is necessary for proper operation of the RHR Shutdown Cooling subsystems and may also prevent water hammer, pump cavitation, and pumping of noncondensable gas into the reactor vessel.

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BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.9.9.2 (continued)

Selection of RHR Shutdown Cooling System locations susceptible to gas accumulation is based on a review of system design information, including piping and instrumentation drawings, isometric drawings, plant and elevation drawings, and calculations. The design review is supplemented by system walk downs to validate the system high points and to confirm the location and orientation of important components that can become sources of gas or could otherwise cause gas to be trapped or difficult to remove during system maintenance or restoration. Susceptible locations depend on plant and system configuration, such as stand-by versus operating conditions.

The RHR Shutdown Cooling System is OPERABLE when it is sufficiently filled with water. Acceptance criteria are established for the volume of accumulated gas at susceptible locations. If accumulated gas is discovered that exceeds the acceptance criteria for the location (or the volume of accumulated gas at one or more susceptible locations exceeds an acceptance criteria for gas volume at the suction or discharge of a pump), the Surveillance is not met. If it is determined by subsequent evaluation that the RHR Shutdown Cooling System is not rendered inoperable by the accumulated gas (i.e., the system is sufficiently filled with water), the Surveillance may be declared met. Accumulated gas should be eliminated or brought within the acceptance criteria limits.

RHR Shutdown Cooling System locations susceptible to gas accumulation are monitored and, if gas is found, the gas volume is compared to the acceptance criteria for the location. Susceptible locations in the same flow path which are subject to the same gas intrusion mechanisms may be verified by monitoring a representative subset of susceptible locations. Monitoring may not be practical for locations that are inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.9.9.2 (continued)

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

REFERENCES

1. 10 CFR 50, Appendix A, GDC 34.
 2. 10 CFR 50.36(c)(2)(ii).
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