

ATTACHMENT TO WNP-2 CYCLE 3 RELOAD SUMMARY REPORT

TECHNICAL SPECIFICATION CHANGES

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2.0 SAFETY LIMITS and LIMITING SAFETY SYSTEM SETTINGS

BASES

INTRODUCTION

ADVANCED NUCLEAR FUELS CORPORATION (ANF)

The fuel cladding, reactor pressure vessel and primary system piping are the principal barriers to the release of radioactive materials to the environs. Safety Limits are established to protect the integrity of these barriers during normal plant operations and anticipated transients. The fuel cladding integrity Safety Limit is set such that no fuel damage is calculated to occur if the limit is not violated. Because fuel damage is not directly observable, a step-back approach is used to establish a Safety Limit such that the MCPR is not less than 1.06 for two recirculation loop operation and 1.07 for single recirculation loop operation for both GE and ~~EC~~ fuel. MCPR greater than 1.06 for two recirculation loop operation and 1.07 for single recirculation loop operation represents a conservative margin relative to the conditions required to maintain fuel cladding integrity. The fuel cladding is one of the physical barriers which separate the radioactive materials from the environs. The integrity of this cladding barrier is related to its relative freedom from perforations or cracking. Although some corrosion or use related cracking may occur during the life of the cladding, fission product migration from this source is incrementally cumulative and continuously measurable. Fuel cladding perforations, however, can result from thermal stresses which occur from reactor operation significantly above design conditions and the Limiting Safety System Settings. While fission product migration from cladding perforation is just as measurable as that from use related cracking, the thermally caused cladding perforations signal a threshold beyond which still greater thermal stresses may cause gross rather than incremental cladding deterioration. Therefore, the fuel cladding integrity Safety Limit is defined with a margin to the conditions which would produce onset of transition boiling, MCPR of 1.0. These conditions represent a significant departure from the condition intended by design for planned operation. The MCPR fuel cladding integrity safety limit assures that during normal operation and during anticipated operational occurrences, at least 99.9 percent of the fuel rods in the core do not experience transition boiling (Reference XN-NF-524 (A), Rev. 1).

2.1 SAFETY LIMITS

2.1.1. THERMAL POWER, Low Pressure or Low Flow

For certain conditions of pressure and flow, the XN-3 correlation is not valid for all critical power calculations. The XN-3 correlation is not valid for bundle mass velocities less than $.25 \times 10^6$ lbs/hr-ft² or pressures less than 585 psig. Therefore, the fuel cladding integrity Safety Limit is established by other means. This is done by establishing a limiting condition on core THERMAL POWER with the following basis. Since the pressure drop in the bypass region is essentially all elevation head, the core pressure drop at low power and flows will always be greater than 4.5 psi. Analyses show that with a bundle flow of 28×10^3 lbs/h (approximately a mass velocity of $.25 \times 10^6$ lbs/hr-ft²), bundle pressure drop is nearly independent of bundle power and has a value of 3.5 psi. Thus, the bundle flow with a 4.5 psi driving head will be greater than 28×10^3 lbs/h. Full scale ATLAS test data taken at pressures from 14.7 psia to 800 psia indicate that the fuel assembly critical power

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SAFETY LIMITS

BASES

THERMAL POWER, Low Pressure or Low Flow (Continued)

at this flow is approximately 3.35 Mwt. With the design peaking factors, this corresponds to a THERMAL POWER of more than 50% of RATED THERMAL POWER. Thus, a THERMAL POWER limit of 25% of RATED THERMAL POWER for reactor pressure below 585 psig is conservative.

2.1.2 THERMAL POWER, High Pressure and High Flow

The fuel cladding integrity Safety Limit is set such that no fuel damage is calculated to occur if the limit is not violated. Since the parameters which result in fuel damage are not directly observable during reactor operation, the thermal and hydraulic conditions resulting in a departure from nucleate boiling have been used to mark the beginning of the region where fuel damage could occur. Although it is recognized that a departure from nucleate boiling would not necessarily result in damage to BWR fuel rods, the critical power at which boiling transition is calculated to occur has been adopted as a convenient limit. However, the uncertainties in monitoring the core operating state and in the procedures used to calculate the critical power result in an uncertainty in the value of the critical power. Therefore, the fuel cladding integrity Safety Limit is defined as the CPR in the limiting fuel assembly for which more than 99.9% of the fuel rods in the core are expected to avoid boiling transition considering the power distribution within the core and all uncertainties.

The Safety Limit MCPR is determined using the ^{ANF} ~~Exxon Nuclear~~ Critical Power Methodology for boiling water reactors ^(a) which is a statistical model that combines all of the uncertainties in operating parameters and the procedures used to calculate critical power. The probability of the occurrence of boiling transition is determined using the ^{ANF} ~~Exxon~~ nuclear critical heat flux-enthalpy XN-3 correlation. The XN-3 correlation is valid over the range of conditions used in the tests of the data used to develop the correlation.

The required input to the statistical model are the uncertainties listed in Bases Table 82.1.2-1 and the nominal values of the core parameters listed in Bases Table 82.1.2-2.

The bases for the uncertainties in the core parameters are given in XN-NF-524(A), Rev. 1^(a) and the basis for the uncertainty in the XN-3 correlation is given in XN-FN-512(A), Rev. 1^(b). The power distribution is based on a typical 764 assembly core in which the rod pattern was arbitrarily chosen to produce a skewed power distribution having the greatest number of assemblies at the highest power levels. The worst distribution during any fuel cycle would not be as severe as the distribution used in the analysis.

- a. Exxon Nuclear Critical Power Methodology for Boiling Water Reactors, XN-NF-524(A), Rev. 1.
- b. Exxon Nuclear Company XN-3 Critical Power Correlation, XN-NF-512(a), Rev. 1.

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REACTIVITY CONTROL SYSTEMS

FOUR CONTROL ROD GROUP SCRAM INSERTION TIMES

LIMITING CONDITION FOR OPERATION

3.1.3.4 The average scram insertion time ^{of all operable control rods} from the fully withdrawn position, for the four control rods arranged in a two-by-two array, based on deenergization of the scram pilot valve solenoids as time zero, shall not exceed any of the following:

<u>Position Inserted From Fully Withdrawn</u>	<u>Average Scram Insertion Time (Seconds)</u>
45	0.455
39	0.920
25	2.052
5	3.706

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

ACTION:

- a. With the average scram insertion times of control rods exceeding the above limits:
 1. Declare the control rods with the slower than average scram insertion times inoperable until an analysis is performed to determine that required scram reactivity remains for the slow four control rod group, and
 2. Perform the Surveillance Requirements of Specification 4.1.3.2.c at least once per 60 days when operation is continued with an average scram insertion time(s) in excess of the average scram insertion time limit.

Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.

- b. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.1.3.4 All control rods shall be demonstrated OPERABLE by scram time testing from the fully withdrawn position as required by Surveillance Requirement 4.1.3.2.

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3/4.2 POWER DISTRIBUTION LIMITS

3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE

LIMITING CONDITION FOR OPERATION

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3.2.1 All AVERAGE PLANAR LINEAR HEAT GENERATION RATES (APLHGRs) for each type of fuel as a function of AVERAGE PLANAR EXPOSURE for GE fuel and average bundle exposure for ~~GE~~ fuel shall not exceed the limits shown in Figures 3.2.1-1, 3.2.1-2, and 3.2.1-3x ~~when in two loop operation, and~~ ^{the limits for single loop operation are shown in} Figures 3.2.1-4, 3.2.1-5, and 3.2.1-6x ~~when in single loop operation~~

APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

ACTION:

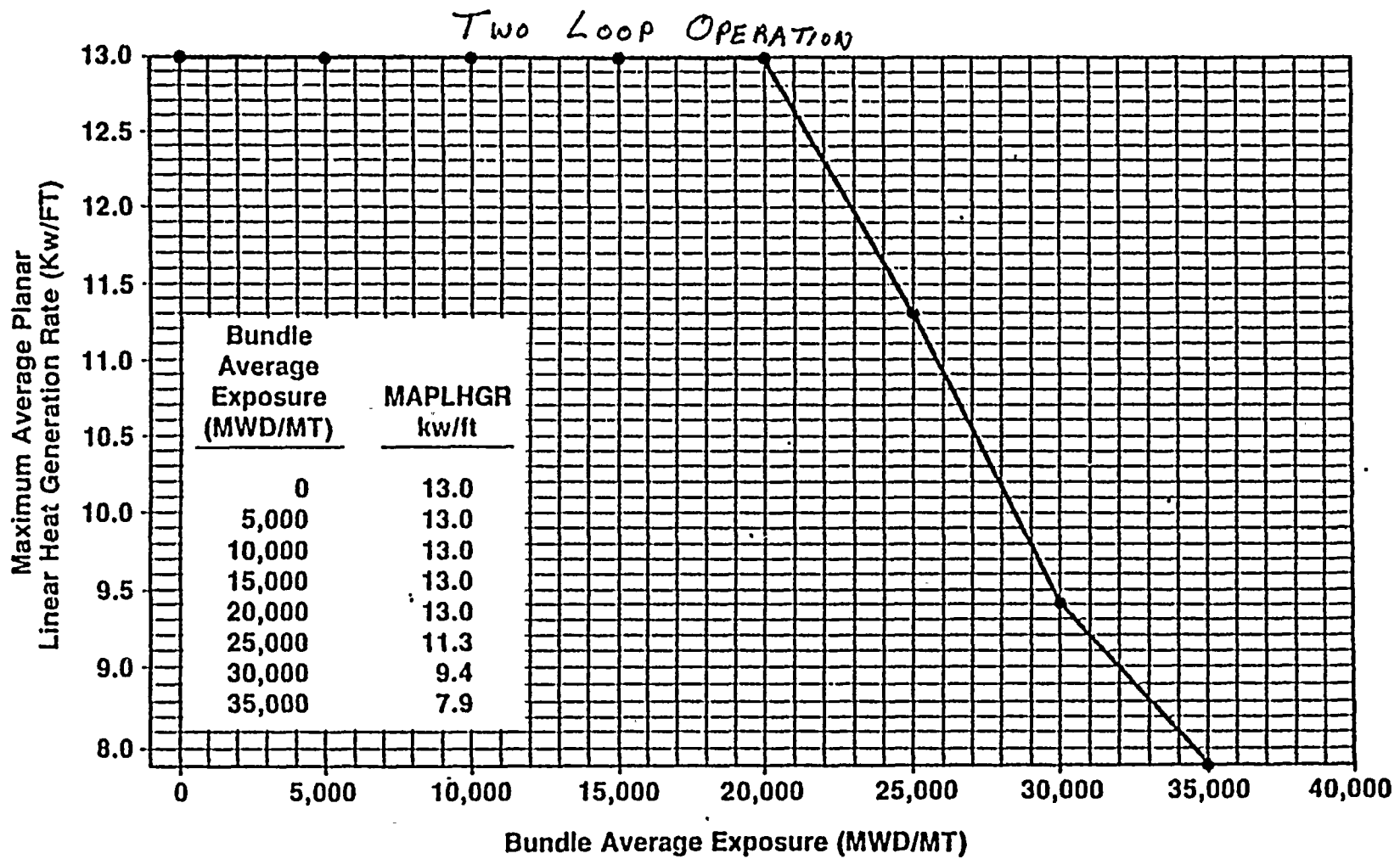
With an APLHGR exceeding the limits of Figure 3.2.1-1, 3.2.1-2, or 3.2.1-3, ^{IN TWO LOOP OPERATION OR} initiate corrective action within 15 minutes and restore APLHGR to within ^{FIGURE 3.2.1-4,} the required limits within 2 hours or reduce THERMAL POWER to less than ^{3.2.1-5, OR 3.2.1-6} 25% of RATED THERMAL POWER within the next 4 hours. ^{IN SINGLE LOOP OPERATION,}

SURVEILLANCE REQUIREMENTS

4.2.1 All APLHGRs shall be verified to be equal to or less than the limits determined from Figures 3.2.1-1, 3.2.1-2, and 3.2.1-3:

- a. At least once per 24 hours,
- b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
- c. Initially and at least once per 12 hours when the reactor is operating with a LIMITING CONTROL ROD PATTERN for APLHGR.

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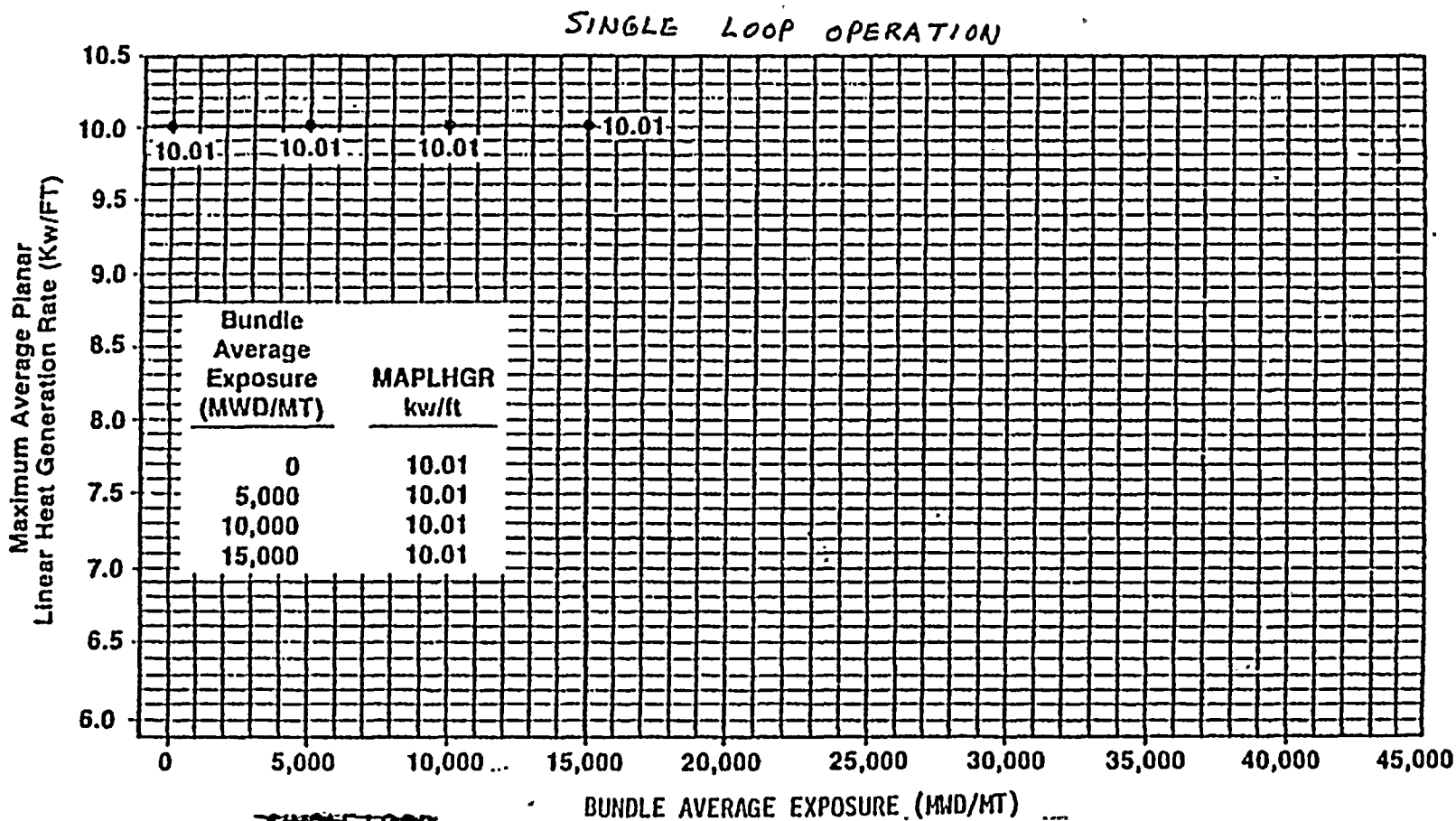


Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) Versus Bundle Average Exposure

~~ENG-XN-1 Fuel~~
 Figure 3.2.1-3
 ANF 8x8 RELOAD FUEL

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Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) Versus BUNDLE AVERAGE EXPOSURE

Figure 3.2.1-6

ANF 8x8 RELOAD FUEL

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Table 3.2.3-1

MCPR OPERATING LIMITS FOR

RATED CORE FLOW

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FOLLOWING TABLE

Equipment Status	MCPR Operating Limit	
	100% Core Flow	106% Core Flow
1. Normal*	1.27 ENC Fuel 1.28 GE Fuel	1.27 ENC Fuel 1.28 GE Fuel
2. Control Rod Insertion Bounded by Tech. Spec. Limits (3.1.3.4 - p3/4 1-7)	1.32 Both Fuel Types	1.32 Both Fuel Types
3. RTP Inoperable, Normal Scram	1.32 ENC Fuel 1.33 GE Fuel	1.33 ENC Fuel 1.34 GE Fuel

- * This MCPR is based on the ENC reload safety analyses performed using the control rod insertion times shown below (defined as normal scram). In the event that surveillance 4.1.3.2 shows these scram insertion times may be exceeded, the plant thermal limits of Step 1. above are to default to the values in Step 2. above and the scram insertion times must meet the requirements of Tech. Spec. 3.1.3.4.

Position Inserted From Fully Withdrawn

Notch 45
Notch 39
Notch 25
Notch 5

Slowest Measured Average Control Rod Insertion Time to Specified Notches for Each Group of 4 Control Rods Arranged in a Two-by-Two Array (Seconds)

.404
.660
1.504
2.624

TABLE 3.2.3-1
MCPR OPERATING LIMITS

	<u>Cycle Exposure</u>	<u>Equipment Status</u>	<u>MCPR Operating Limit Up to 106% Core Flow</u>	
			<u>GE Fuel</u>	<u>ANF Fuel</u>
1.	0 $\frac{\text{MWD}}{\text{MTU}}$ - 4150 $\frac{\text{MWD}}{\text{MTU}}$	*	1.29	1.26
2.	4150 $\frac{\text{MWD}}{\text{MTU}}$ - EOC $\frac{\text{MWD}}{\text{MTU}}$	Normal scram times**	1.32	1.30
3.	4150 $\frac{\text{MWD}}{\text{MTU}}$ - EOC $\frac{\text{MWD}}{\text{MTU}}$	Control rod insertion bounded by Tech. Spec. limits (3.1.3.4 - p 3/4 1-7)	1.39	1.35
4.	4150 $\frac{\text{MWD}}{\text{MTU}}$ - EOC $\frac{\text{MWD}}{\text{MTU}}$	RPT inoperable Normal scram times	1.37	1.35
5.	4150 $\frac{\text{MWD}}{\text{MTU}}$ - EOC $\frac{\text{MWD}}{\text{MTU}}$	RPT inoperable Control rod insertion bounded by Tech. Spec. limits (3.1.3.4 - p 3/4 1-7)	1.43	1.39

*In this portion of the fuel cycle, operation with the given MCPR operating limits is allowed for both normal and Tech. Spec. scram times and for both RPT operable and inoperable.

**These MCPR values are based on the ANF Reload Safety Analysis performed using the control rod insertion times shown below (defined as normal scram). In the event that surveillance 4.1.3.2 shows these scram insertion times have been exceeded, the plant thermal limits associated with normal scram times default to the values associated with Tech. Spec. scram times (3.1.3.4-p 3/4 1-7), and the scram insertion times must meet the requirements of Tech. Spec. 3.1.3.4.

<u>Position Inserted From Fully Withdrawn</u>	<u>Slowest measured average control rod insertion times to specified notches for all operable control rods for each group of 4 control rods arranged in a a two-by-two array (seconds)</u>
Notch 45	.404
Notch 39	.660
Notch 25	1.504
Notch 5	2.624

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POWER DISTRIBUTION LIMITS

3/4.2.4 LINEAR HEAT GENERATION RATE

LIMITING CONDITION FOR OPERATION

3.2.4 The LINEAR HEAT GENERATION RATE (LHGR) for GE fuel shall not exceed 13.4 kW/ft. The LHGR for ~~GE~~ fuel shall not exceed the values shown in Figure 3.2.4-1.

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APPLICABILITY: OPERATIONAL CONDITION 1, when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

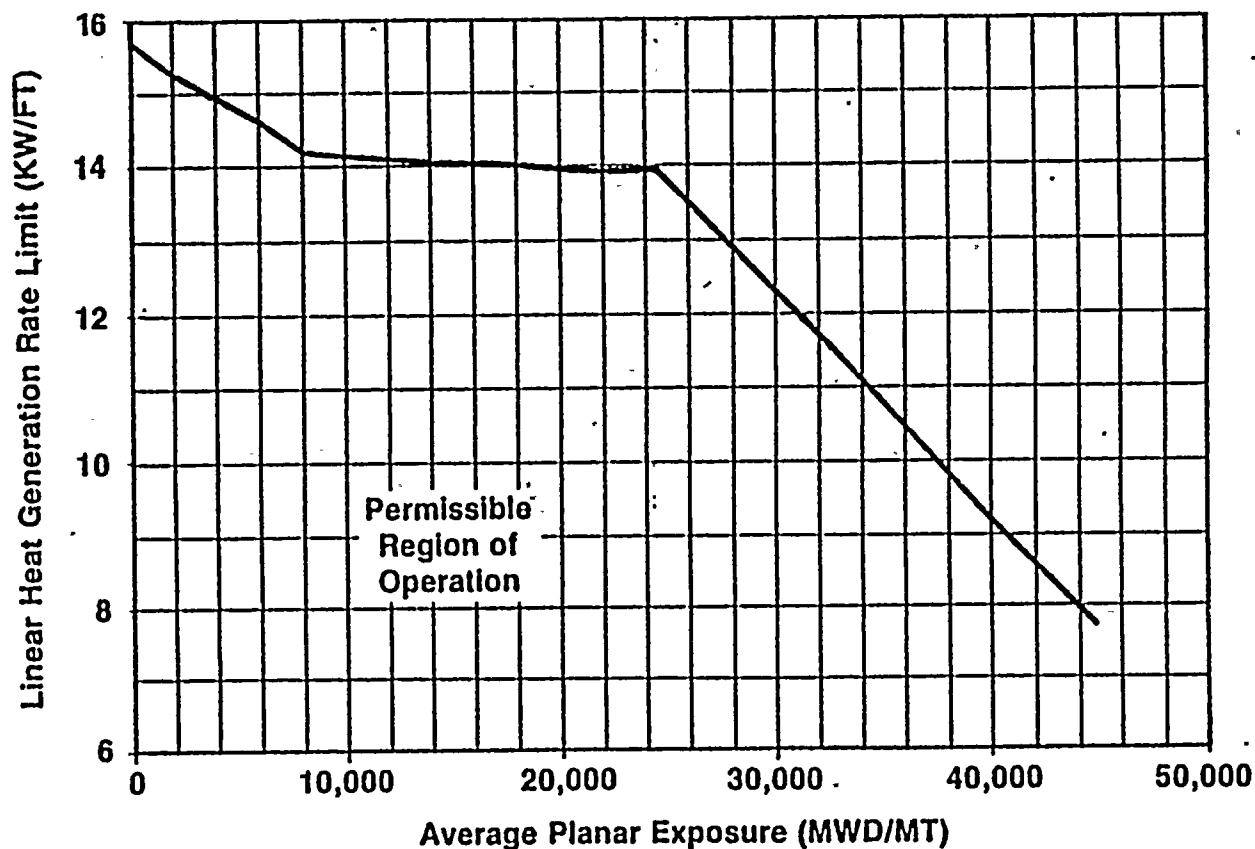
ACTION:

With the LHGR of any fuel rod exceeding the limit, initiate corrective action within 15 minutes and restore the LHGR to within the limit within 2 hours or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

SURVEILLANCE REQUIREMENTS

4.2.4 LHGRs shall be determined to be equal to or less than the limit:

- a. At least once per 24 hours,
- b. Within 12 hours after completion of a THERMAL POWER increase of at least 15% of RATED THERMAL POWER, and
- c. Initially and at least once per 12 hours when the reactor is operating on a LIMITING CONTROL ROD PATTERN for LHGR.



Linear Heat Generation Rate (LHGR) Limit
Versus Average Planar Exposure

From 8 x 8 Fuel
ANF ↑ RELOAD
Figure 3.2.4-1

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INSTRUMENTATION

3/4.3.10 NEUTRON FLUX MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.10 The APRM and LPRM* neutron flux noise levels shall not exceed three (3) times their established baseline values *when operating in the allowable region of Figure 3.3.10-1*

APPLICABILITY: OPERATIONAL CONDITION 1 with two reactor coolant system recirculation loops in operation with THERMAL POWER greater than the limit specified in Figure 3.3.10-1 and total core flow less than 45% of rated total core flow or with one reactor coolant system recirculation loop not in operation with THERMAL POWER greater than the limit specified in Figure 3.3.10-1.

ACTION:

- a. With the APRM or LPRM* neutron flux noise level greater than three (3) times their established baseline noise levels, initiate corrective action within 15 minutes to restore the noise levels to within the required limits within 2 hours or reduce THERMAL POWER to less than or equal to the limit specified in Figure 3.3.10-1 within the next 2 hours.

SURVEILLANCE REQUIREMENTS

4.3.10.1 The provisions of Specification 4.0.4 are not applicable.

4.3.10.2 With two reactor coolant system recirculation loops in operation, establish a baseline APRM and LPRM* neutron flux noise level value within 2 hours upon entering the APPLICABLE OPERATIONAL CONDITION of Specification 3.3.10 provided that baselining has not been performed since the most recent CORE ALTERATION.

4.3.10.3 With one reactor coolant system recirculation loop not in operation, establish a baseline APRM and LPRM* neutron flux noise level value with THERMAL POWER less than or equal to the limit specified in Figure 3.3.10-1 prior to entering the APPLICABLE OPERATIONAL CONDITION of Specification 3.3.10 provided baselining has not been performed with one reactor coolant system recirculation loop not in operation since the most recent CORE ALTERATION.#

→ *With reactor power/core flow in the cross hatched region of Figure 3.3.10-1 initiate corrective action within 15 minutes to reduce power ^{by} ~~with~~ control rod insertion to a reactor power/core flow below the cross hatched region within 2 hours.*

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INSTRUMENTATION

NEUTRON FLUX MONITORING INSTRUMENTATION

SURVEILLANCE REQUIREMENTS (Continued)

4.3.10.4 The APRM and LPRM* neutron flux noise levels shall be determined to be less than or equal to the limit of Specification 3.3.10, when operating within the APPLICABLE OPERATIONAL CONDITION of Specification 3.3.10:

- a. At least once per 8 hours, and
- b. Within 30 minutes after completion of a THERMAL POWER increase of at least 5% of RATED THERMAL POWER.

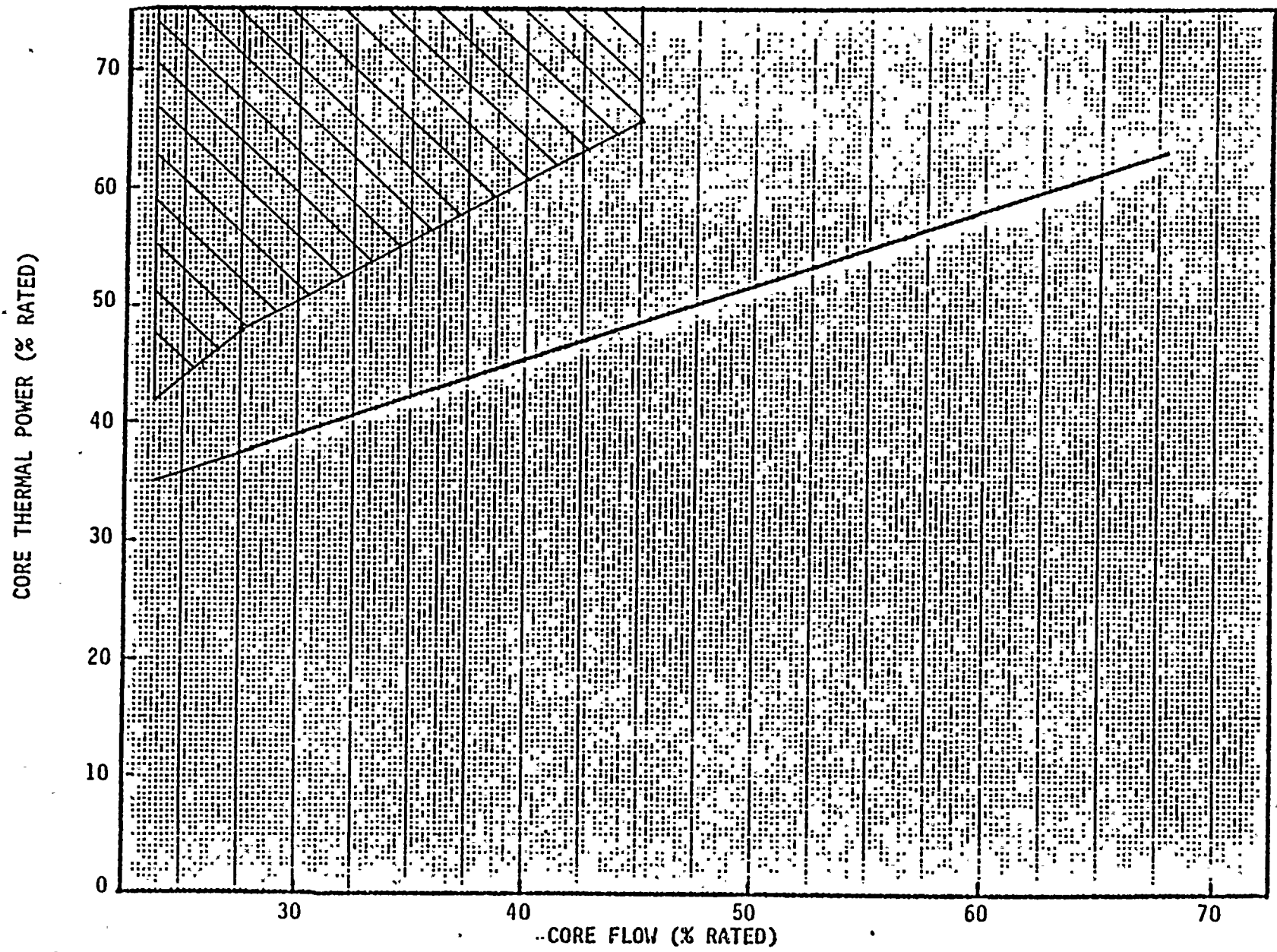
and the reactor power/core flow shall be verified to lie outside the crosshatched region of Figure 3.3.10-1.

*Detector levels A and C of one LPRM string per core octant plus detector levels A and C of one LPRM string in the center of the core should be monitored.

#The baseline data obtained in Specification 4.3.10.3 is applicable to operation with one reactor coolant system recirculation loop not in operation and THERMAL POWER greater than the limits specified in Figure 3.3.10-1.

FIGURE 3.3.10-1

THERMAL POWER LIMITS OF SPECIFICATION 3.3.10-1



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REACTIVITY CONTROL SYSTEMS

BASES

3/4.1.3 CONTROL RODS

The specification of this section ensure that (1) the minimum SHUTDOWN MARGIN is maintained, (2) the control rod insertion times are consistent with those used in the safety analyses, and (3) limit the potential effects of the rod drop accident. The ACTION statements permit variations from the basic requirements but at the same time impose more restrictive criteria for continued operation. A limitation on inoperable rods is set such that the resultant effect on total rod worth and scram shape will be kept to a minimum. The requirements for the various scram time measurements ensure that any indication of systematic problems with rod drives will be investigated on a timely basis.

Damage within the control rod drive mechanism could be a generic problem, therefore with a control rod immovable because of excessive friction or mechanical interference, operation of the reactor is limited to a time period which is reasonable to determine the cause of the inoperability and at the same time prevent operation with a large number of inoperable control rods.

Control rods that are inoperable for other reasons are permitted to be taken out of service provided that those in the nonfully inserted position are consistent with the SHUTDOWN MARGIN requirements.

The number of control rods permitted to be inoperable could be more than the eight allowed by the specification, but the occurrence of eight inoperable rods could be indicative of a generic problem and the reactor must be shutdown for investigation and resolution of the problem.

THE CYCLE SPECIFIC TRANSIENT ANALYSIS REPORT

The control rod system is designed to bring the reactor subcritical at a rate fast enough to prevent the MCPR from becoming less than the fuel cladding safety limit during the core wide transient analyzed in ~~WV-26-05-148~~. This analysis shows that the negative reactivity rates resulting from the scram with the average response of all the drives as given in the specifications, provide the required protection and MCPR remains greater than the fuel cladding safety limit. The occurrence of scram times longer than those specified should be viewed as an indication of a systemic problem with the rod drives and therefore the surveillance interval is reduced in order to prevent operation of the reactor for long periods of time with a potentially serious problem.

The scram discharge volume is required to be OPERABLE so that it will be available when needed to accept discharge water from the control rods during a reactor scram and will isolate the reactor coolant system from the containment when required.

Control rods with inoperable accumulators are declared inoperable and Specification 3.1.3.1 then applies. This prevents a pattern of inoperable accumulators that would result in less reactivity insertion on a scram than has been analyzed even though control rods with inoperable accumulators may still be inserted with normal drive water pressure. Operability of the accumulator ensures that there is a means available to insert the control rods even under the most unfavorable depressurization of the reactor.

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3/4.2 POWER DISTRIBUTION LIMITS

BASES

The specifications of this section assure that the peak cladding temperature following the postulated design basis loss-of-coolant accident will not exceed the 2200°F limit specified in 10 CFR 50.46.

3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE

The peak cladding temperature (PCT) following a postulated loss-of-coolant accident is primarily a function of the average heat generation rate of all the rods of a fuel assembly at any axial location and is dependent only secondarily on the rod to rod power distribution within an assembly. For GE fuel, the peak clad temperature is calculated assuming a LHGR for the highest powered rod which is equal to or less than the design LHGR corrected for densification. This LHGR times 1.02 is used in the heatup code along with the exposure dependent steady-state gap conductance and rod-to-rod local peaking factor. The Technical Specification AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) for GE fuel is this LHGR of the highest powered rod divided by its local peaking factor which results in a calculated LOCA PCT much less than 2200°F. The Technical Specification APLHGR for ~~GE~~ ^{ANE} fuel is specified to assure the PCT following a postulated LOCA will not exceed the 2200°F limit. The limiting value for APLHGR is shown in Figures 3.2.1-1, 3.2.1-2, and 3.2.1-3 for two recirculation loop operation. These values shall be multiplied by a factor of 0.84 for single recirculation loop operation. This multiplier is determined from comparison of the limiting analysis between two recirculation loop and single recirculation loop operation.

The calculational procedure used to establish the APLHGR shown on Figures 3.2.1-1, 3.2.1-2, and 3.2.1-3 is based on a loss-of-coolant accident analysis. The analysis was performed using calculational models which are consistent with the requirements of Appendix K to 10 CFR Part 50. These models are described in Reference 1 or XN-NF-80-19, Volumes 2, 2A, 2B and 2C, Rev. 1.

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POWER DISTRIBUTION LIMITS

BASES

3/4.2.3 MINIMUM CRITICAL POWER RATIO

The required operating limit MCPRs at steady-state operating conditions as specified in Specification 3.2.3 are derived from the established fuel cladding integrity Safety Limit MCPR and an analysis of abnormal operational transients. For any abnormal operating transient analysis evaluation with the initial condition of the reactor being at the steady-state operating limit, it is required that the resulting MCPR does not decrease below the Safety Limit MCPR at any time during the transient assuming instrument trip setting given in Specification 2.2.

To assure that the fuel cladding integrity Safety Limit is not exceeded during any anticipated abnormal operational transient, the most limiting transients have been analyzed to determine which result in the largest reduction in CRITICAL POWER RATIO (CPR). The type of transients evaluated were loss of flow, increase in pressure and power, positive reactivity insertion, and coolant temperature decrease. The limiting transient yields the largest delta MCPR. When added to the Safety Limit MCPR, the required minimum operating limit MCPR of Specification 3.2.3 is obtained and presented in Table 3.2.3-1.

~~THE CYCLE SPECIFIC TRANSIENT ANALYSIS REPORT~~ ANF

The evaluation of a given transient begins with the system initial parameters shown in ~~XN-NF-85-143~~ that are input to a ~~core~~ dynamic behavior transient computer program. The outputs of this program along with the initial MCPR form the input for further analyses of the thermally limiting bundle. The codes and methodology to evaluate pressurization and nonpressurization events are described in XN-NF-79-71(2). The principal result of this evaluation is the reduction in MCPR caused by the transient.

AND XN-NF-84-105(A).

The purpose of the $MCPR_f$ of Figure 3.2.3-1 is to define operating limits at other than rated core flow conditions. At less than 100% of rated flow the required MCPR is the maximum of the rated flow MCPR determined from Table 3.2.3-1 and the reduced flow MCPR determined from Figure 3.2.3-1, $MCPR_f$ assures that the Safety Limit MCPR will not be violated. $MCPR_f$ is only calculated for the manual flow control mode. Automatic flow control operation is not permitted.

PLANT SYSTEMS

BASES

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. When the inoperable fire fighting equipment is intended for use as a backup means of fire suppression, a longer period of time is allowed to provide an alternate means of fire fighting than if the inoperable equipment is the primary means of fire suppression.

The surveillance requirements provide assurances that the minimum OPERABILITY requirements of the fire suppression systems are met. An allowance is made for ensuring a sufficient volume of Halon in the Halon storage tanks by verifying the weight and pressure of the tanks.

In the event the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant.

3/4.7.7 FIRE-RATED ASSEMBLIES

The OPERABILITY of the fire barriers and barrier penetrations ensure that fire damage will be limited. These design features minimize the possibility of a single fire involving more than one fire area prior to detection and extinguishment. The fire barriers, fire barrier penetrations for conduits, cable trays and piping, fire windows, fire dampers, and fire doors are periodically inspected to verify their OPERABILITY.

3/4.7.8 AREA TEMPERATURE MONITORING

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and can cause loss of its OPERABILITY.

3/4.7.9 MAIN TURBINE BYPASS SYSTEM

the cycle specific analysis.

The main turbine bypass system is required to be OPERABLE consistent with the assumptions of the feedwater controller failure analysis of ~~Form Chapter 35~~. The main turbine bypass system provides pressure relief during the feedwater controller failure event so that the safety limit MCPR is not violated.