

**REQUEST FOR ENFORCEMENT DISCRETION TO TECHNICAL SPECIFICATION
RESPONSE TIME TESTING REQUIREMENTS**

Attachment 1

Proposed Technical Specification pages

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1.1 Definitions

DOSE EQUIVALENT I-131
(continued)

Power and Test Reactor Sites;" Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977; or ICRP 30, Supplement to Part 1, page 192-212, Table titled "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity."

EMERGENCY CORE COOLING
SYSTEM (ECCS) RESPONSE
TIME

The ECCS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its ECCS initiation setpoint at the channel sensor until the ECCS 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.↑

END OF CYCLE
RECIRCULATION PUMP TRIP
(EOC-RPT) SYSTEM RESPONSE
TIME

The EOC-RPT SYSTEM RESPONSE TIME shall be that time interval from initial signal generation by the associated turbine throttle valve limit switch or from when the turbine governor valve hydraulic control oil pressure drops below the pressure switch setpoint to complete suppression of the electric arc between the fully open contacts of the recirculation pump circuit breaker. 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.

ISOLATION SYSTEM
RESPONSE TIME

The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation initiation setpoint at the channel sensor until the isolation valves travel to their required positions. 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.↑

(continued)

The RESPONSE TIME may also be evaluated using an alternate methodology if previously reviewed and approved by the staff.

1.1 Definitions (continued)

RATED THERMAL POWER
(RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3486 MWt.

REACTOR PROTECTION
SYSTEM (RPS) RESPONSE
TIME

The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. 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. ↑

SHUTDOWN MARGIN (SDM)

SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that:

- a. The reactor is xenon free;
- b. The moderator temperature is 68°F; and
- c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn. With control rods not capable of being fully inserted, the reactivity worth of these control rods must be accounted for in the determination of SDM.

STAGGERED TEST BASIS

A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

TURBINE BYPASS SYSTEM
RESPONSE TIME

The TURBINE BYPASS SYSTEM RESPONSE TIME shall be the time from when the turbine bypass control unit generates a turbine bypass valve flow signal until 80% of the turbine bypass capacity is established.

(continued)

The RESPONSE TIME may also be evaluated using an alternate methodology if previously reviewed and approved by the staff.

