

**REQUEST FOR AMENDMENT TO OPERATING LICENSE REGARDING TECHNICAL
SPECIFICATION RESPONSE TIME TESTING**

Attachment 2
Technical Specification Pages

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.1.15 -----NOTES-----</p> <p>1. Neutron detectors are excluded.</p> <p>3 Z. For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency.</p> <p>-----</p> <p>Verify the RPS RESPONSE TIME is within limits.</p>	<p>24 months on a STAGGERED TEST BASIS</p>

2. CHANNEL SENSORS FOR FUNCTIONS 3 AND 4 ARE EXCLUDED

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c, 3.f, and 3.g; and (b) for up to 6 hours for Functions other than 3.c, 3.f, and 3.g provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
DELETE SR 3.3.5.1.7	Verify the ECCS RESPONSE TIME for each required ECCS injection/spray subsystem is within limits.	24 months on a STAGGERED TEST BASIS

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ -148 inches
b. Drywell Pressure - High	1,2,3	2(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ 1.88 psig
c. LPCS Pump Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 8.53 seconds and ≤ 10.64 seconds
d. LPCI Pump A Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 17.24 seconds and ≤ 21.53 seconds
e. LPCI Pump A Start - LOCA/LOOP Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≥ 3.04 seconds and ≤ 6.00 seconds
f. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3 4(a),5(a)	1 per valve 1 per valve	C B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 psig and ≤ 492 psig ≥ 448 psig and ≤ 492 psig
g. LPCS Pump Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 668 gpm and ≤ 1067 gpm
h. LPCI Pump A Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 605 gpm and ≤ 984 gpm
i. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator (DG).

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCS System (continued)					
b. Drywell Pressure - High	1,2,3	4(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ 1.88 psig
c. Reactor Vessel Water Level - High, Level 8	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 56.0 inches
d. Condensate Storage Tank Level - Low	1,2,3, 4(c),5(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 ft 1 inch elevation
e. Suppression Pool Water Level - High	1,2,3	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 466 ft 11 inches elevation
f. HPCS System Flow Rate - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 1200 gpm and ≤ 1512 gpm
g. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2(d),3(d)	2	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ -148 inches
b. ADS Initiation Timer	1,2(d),3(d)	1	G	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≤ 115.0 seconds
c. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1,2(d),3(d)	1	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 9.5 inches
d. LPCS Pump Discharge Pressure - High	1,2(d),3(d)	2	G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 119 psig and ≤ 171 psig

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated DG.

(c) When HPCS is OPERABLE for compliance with LCO 3.5.2, "ECCS - Shutdown," and aligned to the condensate storage tank while tank water level is not within the limit of SR 3.5.2.2.

(d) With reactor steam dome pressure > 150 psig.

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI B and LPCI C Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ -148 inches
b. Drywell Pressure - High	1,2,3	2(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≤ 1.88 psig
c. LPCI Pump B Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 17.24 seconds and ≤ 21.53 seconds
d. LPCI Pump C Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 8.53 seconds and ≤ 10.64 seconds
e. LPCI Pump B Start - LOCA/LOOP Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≥ 3.04 seconds and ≤ 6.00 seconds
f. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3 4(a),5(a)	1 per valve 1 per valve	C B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 psig and ≤ 492 psig ≥ 448 psig and ≤ 492 psig
g. LPCI Pumps B & C Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1 per pump	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 605 gpm and ≤ 984 gpm
h. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA
3. High Pressure Core Spray (HPCS) System					
a. Reactor Vessel Water Level - Low Low, Level 2	1,2,3, 4(a),5(a)	4(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.7	≥ -58 inches

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated DG.



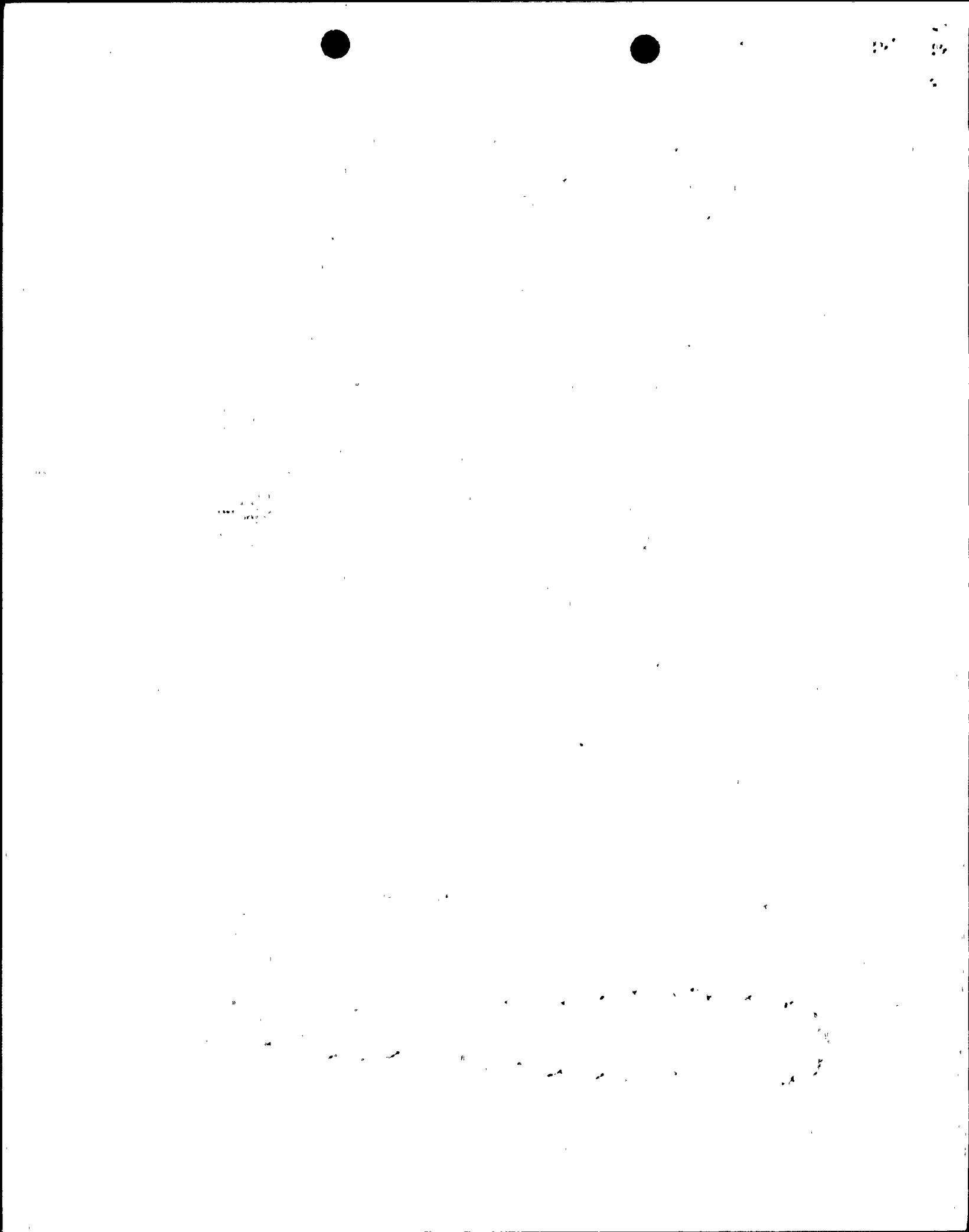
SURVEILLANCE REQUIREMENTS

NOTES

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains isolation capability.

SURVEILLANCE	FREQUENCY
SR 3.3.6.1.1 Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.6.1.3 Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.4 Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.5 Perform CHANNEL CALIBRATION.	24 months
SR 3.3.6.1.6 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.6.1.7 Verify the ISOLATION SYSTEM RESPONSE TIME is within limits.	24 months on a STAGGERED TEST BASIS

NOTE
CHANNEL SENSORS FOR FUNCTIONS 1.a, 1.b, AND 1.c ARE EXCLUDED



SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE			FREQUENCY												
SR 3.5.1.4	Verify each ECCS pump develops the specified flow rate with the specified developed head.		In accordance with the Inservice Testing Program												
	<table><tr><td><u>SYSTEM</u></td><td><u>FLOW RATE</u></td><td><u>TOTAL DEVELOPED HEAD</u></td></tr><tr><td>LPCS</td><td>≥ 6350 gpm</td><td>≥ 128 psid</td></tr><tr><td>LPCI</td><td>≥ 7450 gpm</td><td>≥ 26 psid</td></tr><tr><td>HPCS</td><td>≥ 6350 gpm</td><td>≥ 200 psid</td></tr></table>	<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>TOTAL DEVELOPED HEAD</u>	LPCS	≥ 6350 gpm	≥ 128 psid	LPCI	≥ 7450 gpm	≥ 26 psid	HPCS	≥ 6350 gpm	≥ 200 psid		
<u>SYSTEM</u>	<u>FLOW RATE</u>	<u>TOTAL DEVELOPED HEAD</u>													
LPCS	≥ 6350 gpm	≥ 128 psid													
LPCI	≥ 7450 gpm	≥ 26 psid													
HPCS	≥ 6350 gpm	≥ 200 psid													
SR 3.5.1.5	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>		24 months												
SR 3.5.1.6	<p>-----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>		24 months												
SR 3.5.1.7	<p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each required ADS valve opens when manually actuated.</p>		24 months on a STAGGERED TEST BASIS for each valve solenoid												

SEE INSERT

INSERT

ECCS—Operating
3.5.1

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.8 -----NOTE----- ECCS actuation instrumentation is excluded. -----</p> <p>Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.</p>	<p>24 months</p>

1. 1000
2. 1000
3. 1000

TABLE OF CONTENTS

3.3	INSTRUMENTATION (continued)	
3.3.6.2	Secondary Containment Isolation Instrumentation . .	3.3-59
3.3.7.1	Control Room Emergency Filtration (CREF) System Instrumentation	3.3-63
3.3.8.1	Loss of Power (LOP) Instrumentation	3.3-68
3.3.8.2	Reactor Protection System (RPS) Electric Power Monitoring	3.3-72
3.4	REACTOR COOLANT SYSTEM (RCS)	3.4-1
3.4.1	Recirculation Loops Operating	3.4-1
3.4.2	Jet Pumps	3.4-5
3.4.3	Safety/Relief Valves (SRVs) — \geq 25% RTP	3.4-7
3.4.4	Safety/Relief Valves (SRVs) — $<$ 25% RTP	3.4-8
3.4.5	RCS Operational LEAKAGE	3.4-10
3.4.6	RCS Pressure Isolation Valve (PIV) Leakage	3.4-12
3.4.7	RCS Leakage Detection Instrumentation	3.4-14
3.4.8	RCS Specific Activity	3.4-16
3.4.9	Residual Heat Removal (RHR) Shutdown Cooling System—Hot Shutdown	3.4-18
3.4.10	Residual Heat Removal (RHR) Shutdown Cooling System—Cold Shutdown	3.4-21
3.4.11	RCS Pressure and Temperature (P/T) Limits	3.4-23
3.4.12	Reactor Steam Dome Pressure	3.4-31
3.5	EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM	3.5-1
3.5.1	ECCS—Operating	3.5-1
3.5.2	ECCS—Shutdown	3.5-7
3.5.3	RCIC System	3.5-11
3.6	CONTAINMENT SYSTEMS	3.6-1
3.6.1.1	Primary Containment	3.6-1
3.6.1.2	Primary Containment Air Lock	3.6-3
3.6.1.3	Primary Containment Isolation Valves (PCIVs)	3.6-8
3.6.1.4	Drywell Air Temperature	3.6-16
3.6.1.5	Residual Heat Removal (RHR) Drywell Spray	3.6-17
3.6.1.6	Reactor Building-to-Suppression Chamber Vacuum Breakers	3.6-19
3.6.1.7	Suppression Chamber-to-Drywell Vacuum Breakers	3.6-22
3.6.1.8	Main Steam Isolation Valve Leakage Control (MSLC) System	3.6-25
3.6.2.1	Suppression Pool Average Temperature	3.6-27
3.6.2.2	Suppression Pool Water Level	3.6-30
3.6.2.3	Residual Heat Removal (RHR) Suppression Pool Cooling	3.6-31

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.3.1.1.15 -----NOTES-----</p> <ol style="list-style-type: none"> 1. Neutron detectors are excluded. 2. Channel sensors for Functions 3 and 4 are excluded. 3. For Function 5, "n" equals 4 channels for the purpose of determining the STAGGERED TEST BASIS Frequency. <p>-----</p> <p>Verify the RPS RESPONSE TIME is within limits.</p>	<p>24 months on a STAGGERED TEST BASIS</p>

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.5.1-1 to determine which SRs apply for each ECCS Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed as follows: (a) for up to 6 hours for Functions 3.c, 3.f, and 3.g; and (b) for up to 6 hours for Functions other than 3.c, 3.f, and 3.g provided the associated Function or the redundant Function maintains ECCS initiation capability.

SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1 Perform CHANNEL CHECK.	12 hours
SR 3.3.5.1.2 Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.5.1.3 Perform CHANNEL CALIBRATION.	92 days
SR 3.3.5.1.4 Perform CHANNEL CALIBRATION.	18 months
SR 3.3.5.1.5 Perform CHANNEL CALIBRATION.	24 months
SR 3.3.5.1.6 Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months

Table 3.3.5.1-1 (page 1 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ -148 inches
b. Drywell Pressure - High	1,2,3	2(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 1.88 psig.
c. LPCS Pump Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 8.53 seconds and ≤ 10.64 seconds
d. LPCI Pump A Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 17.24 seconds and ≤ 21.53 seconds
e. LPCI Pump A Start - LOCA/LOOP Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≥ 3.04 seconds and ≤ 6.00 seconds
f. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3 4(a),5(a)	1 per valve 1 per valve	C B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 psig and ≤ 492 psig ≥ 448 psig and ≤ 492 psig
g. LPCS Pump Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 668 gpm and ≤ 1067 gpm
h. LPCI Pump A Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 605 gpm and ≤ 984 gpm
i. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated diesel generator (DG).

Table 3.3.5.1-1 (page 2 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
2. LPCI B and LPCI C Subsystems					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2,3, 4(a),5(a)	2(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ -148 inches
b. Drywell Pressure - High	1,2,3	2(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 1.88 psig
c. LPCI Pump B Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 17.24 seconds and ≤ 21.53 seconds
d. LPCI Pump C Start - LOCA Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.5 SR 3.3.5.1.6	≥ 8.53 seconds and ≤ 10.64 seconds
e. LPCI Pump B Start - LOCA/LOOP Time Delay Relay	1,2,3, 4(a),5(a)	1	C	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≥ 3.04 seconds and ≤ 6.00 seconds
f. Reactor Vessel Pressure - Low (Injection Permissive)	1,2,3 4(a),5(a)	1 per valve 1 per valve	C B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 psig and ≤ 492 psig ≥ 448 psig and ≤ 492 psig
g. LPCI Pumps B & C Discharge Flow - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1 per pump	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 605 gpm and ≤ 984 gpm
h. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA
3. High Pressure Core Spray (HPCS) System					
a. Reactor Vessel Water Level - Low Low, Level 2	1,2,3, 4(a),5(a)	4(b)	B	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ -58 inches

(continued)

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated DG.

Table 3.3.5.1-1 (page 3 of 4)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
3. HPCS System (continued)					
b. Drywell Pressure - High	1,2,3	4(b)	B	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 1.88 psig
c. Reactor Vessel Water Level - High, Level 8	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 56.0 inches
d. Condensate Storage Tank Level - Low	1,2,3, 4(c),5(c)	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 448 ft 1 inch elevation
e. Suppression Pool Water Level - High	1,2,3	2	D	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≤ 466 ft 11 inches elevation
f. HPCS System Flow Rate - Low (Minimum Flow)	1,2,3, 4(a),5(a)	1	E	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 1200 gpm and ≤ 1512 gpm
g. Manual Initiation	1,2,3, 4(a),5(a)	2	C	SR 3.3.5.1.6	NA
4. Automatic Depressurization System (ADS) Trip System A					
a. Reactor Vessel Water Level - Low Low Low, Level 1	1,2(d),3(d)	2	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ -148 inches
b. ADS Initiation Timer	1,2(d),3(d)	1	G	SR 3.3.5.1.2 SR 3.3.5.1.3 SR 3.3.5.1.6	≤ 115.0 seconds
c. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1,2(d),3(d)	1	F	SR 3.3.5.1.1 SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 9.5 inches
d. LPCS Pump Discharge Pressure - High	1,2(d),3(d)	2	G	SR 3.3.5.1.2 SR 3.3.5.1.4 SR 3.3.5.1.6	≥ 119 psig and ≤ 171 psig
(continued)					

(a) When associated subsystem(s) are required to be OPERABLE.

(b) Also required to initiate the associated DG.

(c) When HPCS is OPERABLE for compliance with LCO 3.5.2, "ECCS - Shutdown," and aligned to the condensate storage tank while tank water level is not within the limit of SR 3.5.2.2.

(d) With reactor steam dome pressure > 150 psig.

SURVEILLANCE REQUIREMENTS

-----NOTES-----

1. Refer to Table 3.3.6.1-1 to determine which SRs apply for each Primary Containment Isolation Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains isolation capability.

SURVEILLANCE		FREQUENCY
SR 3.3.6.1.1	Perform CHANNEL CHECK.	12 hours
SR 3.3.6.1.2	Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.6.1.3	Perform CHANNEL FUNCTIONAL TEST.	184 days
SR 3.3.6.1.4	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.6.1.5	Perform CHANNEL CALIBRATION.	24 months
SR 3.3.6.1.6	Perform LOGIC SYSTEM FUNCTIONAL TEST.	24 months
SR 3.3.6.1.7	-----NOTE----- Channel sensors for Functions 1.a, 1.b, and 1.c are excluded. Verify the ISOLATION SYSTEM RESPONSE TIME is within limits.	24 months on a STAGGERED TEST BASIS

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE			FREQUENCY												
SR 3.5.1.4	Verify each ECCS pump develops the specified flow rate with the specified developed head.	<table><thead><tr><th>SYSTEM</th><th>FLOW RATE</th><th>TOTAL DEVELOPED HEAD</th></tr></thead><tbody><tr><td>LPCS</td><td>≥ 6350 gpm</td><td>≥ 128 psid</td></tr><tr><td>LPCI</td><td>≥ 7450 gpm</td><td>≥ 26 psid</td></tr><tr><td>HPCS</td><td>≥ 6350 gpm</td><td>≥ 200 psid</td></tr></tbody></table>	SYSTEM	FLOW RATE	TOTAL DEVELOPED HEAD	LPCS	≥ 6350 gpm	≥ 128 psid	LPCI	≥ 7450 gpm	≥ 26 psid	HPCS	≥ 6350 gpm	≥ 200 psid	In accordance with the Inservice Testing Program
SYSTEM	FLOW RATE	TOTAL DEVELOPED HEAD													
LPCS	≥ 6350 gpm	≥ 128 psid													
LPCI	≥ 7450 gpm	≥ 26 psid													
HPCS	≥ 6350 gpm	≥ 200 psid													
SR 3.5.1.5	<p>-----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	24 months													
SR 3.5.1.6	<p>-----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	24 months													
SR 3.5.1.7	<p>-----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. -----</p> <p>Verify each required ADS valve opens when manually actuated.</p>	24 months on a STAGGERED TEST BASIS for each valve solenoid													

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.8 -----NOTE----- ECCS actuation instrumentation is excluded. ----- Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limits.</p>	<p>24 months</p>

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 ECCS—Shutdown

LCO 3.5.2 Two ECCS injection/spray subsystems shall be OPERABLE.

APPLICABILITY: MODE 4,
MODE 5 except with the spent fuel storage pool gates removed
and water level ≥ 22 ft over the top of the reactor
pressure vessel flange.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs).	Immediately
C. Two required ECCS injection/spray subsystems inoperable.	C.1 Initiate action to suspend OPDRVs. <u>AND</u> C.2 Restore one ECCS injection/spray subsystem to OPERABLE status.	Immediately 4 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action C.2 and associated Completion Time not met.	D.1 Initiate action to restore secondary containment to OPERABLE status.	Immediately
	<u>AND</u>	
	D.2 Initiate action to restore one standby gas treatment subsystem to OPERABLE status.	Immediately
	<u>AND</u>	
	D.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.5.2.1 Verify, for each required low pressure ECCS injection/spray subsystem, the suppression pool water level is \geq 18 ft 6 inches.	12 hours

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.2.2 Verify, for the required High Pressure Core Spray (HPCS) System, the:</p> <p> a. Suppression pool water level is \geq 18 ft 6 inches; or</p> <p> b. Condensate storage tank (CST) water level is \geq 13.25 ft in a single CST or \geq 7.6 ft in each CST.</p>	<p>12 hours</p>
<p>SR 3.5.2.3 Verify, for each required ECCS injection/spray subsystem, the piping is filled with water from the pump discharge valve to the injection valve.</p>	<p>31 days</p>
<p>SR 3.5.2.4 -----NOTE----- One low pressure coolant injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable. -----</p> <p>Verify each required ECCS injection/spray subsystem manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>31 days</p>

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE			FREQUENCY
SR 3.5.2.5	Verify each required ECCS pump develops the specified flow rate with the specified developed head.		In accordance with the Inservice Testing Program
		TOTAL DEVELOPED HEAD	
	<u>SYSTEM</u>	<u>FLOW RATE</u>	
	LPCS	≥ 6350 gpm	
	LPCI	≥ 7450 gpm	
SR 3.5.2.6	HPCS	≥ 6350 gpm	
	-----NOTE-----		
	Vessel injection/spray may be excluded.		
	Verify each required ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.		24 months

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCIC System inoperable.	A.1 Verify by administrative means High Pressure Core Spray System is OPERABLE.	Immediately
	<u>AND</u> A.2 Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Reduce reactor steam dome pressure to \leq 150 psig.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.5.3.1 Verify the RCIC System piping is filled with water from the pump discharge valve to the injection valve.	31 days
SR 3.5.3.2 Verify each RCIC System manual, power operated, and automatic valve in the flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position.	31 days
SR 3.5.3.3 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----- Verify, with reactor pressure ≤ 1035 psig and ≥ 935 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.	92 days
SR 3.5.3.4 -----NOTE----- Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test. ----- Verify, with reactor pressure ≤ 165 psig, the RCIC pump can develop a flow rate ≥ 600 gpm against a system head corresponding to reactor pressure.	24 months

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.3.5 -----NOTE----- Vessel injection may be excluded. ----- Verify the RCIC System actuates on an actual or simulated automatic initiation signal.</p>	<p>24 months</p>

REQUEST FOR AMENDMENT TO OPERATING LICENSE REGARDING TECHNICAL SPECIFICATION RESPONSE TIME TESTING

Attachment 3
Page 1 of 3

NO SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10CFR50.91, a licensee must provide to the staff analysis of a proposed amendment to the operating license using the standards in 10CFR50.92 concerning the issue of no significant hazards consideration. The Supply System has evaluated the proposed amendment to the operating license and determined that it does not involve a significant hazards consideration.

The following evaluation is provided for the three categories of no significant hazards consideration standards:

Operation of WNP-2 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The purpose of the proposed license change is to eliminate response time testing requirements for selected instrumentation in the Reactor Protection System (RPS), Primary Containment Isolation Actuation, and Emergency Core Cooling System (ECCS). However, because of the continued application of other existing Technical Specification required testing such as channel calibrations, channel checks, channel functional tests, and logic system functional tests, the response time of these systems will be maintained within the limits assumed in plant safety analyses and required for successful mitigation of an initiating event. The proposed license change does not affect the capability of the associated systems to perform their intended functions within the required response time, nor do the proposed changes affect the operation of any equipment.

The Reference 1 evaluation demonstrates that response time testing is redundant to the other Technical Specification required testing listed in the preceding paragraph. This evaluation was reviewed and approved by the staff. These other tests, in conjunction with actions taken in response to NRC Bulletin 90-01, "Loss of Fill-Oil in Transmitters Manufactured by Rosemount," and Supplement 1, are sufficient to identify failure modes or degradations in instrument response time and ensure operation of the associated systems within acceptable limits. Furthermore, all known failure modes that are detected by response time testing are also detected by other Technical Specification tests.

In addition, two categories of components were included in this change in testing methodology which were not identified in the table of components in Reference 1. These components are used within the logic circuits addressed in Reference 1. These components were inadvertently omitted from lists provided to General Electric in support of preparation of the Reference 1 tables.

REQUEST FOR AMENDMENT TO OPERATING LICENSE REGARDING TECHNICAL SPECIFICATION RESPONSE TIME TESTING

Attachment 3
Page 2 of 3

These components have been reviewed for similarity to the items contained within the Reference 1 component tables and have been found to be similar to other equipment referenced in the table. These components are also subject to periodic functional testing by CFTs and LSFTs. The Supply System verified instrument response of these components at an appropriate interval using the alternate methodology for instrument verification described in Reference 1.

The two categories of components referenced above which are not included in the Reference 1 component list have no postulated functions or affects which may cause an accident. These devices are tested periodically to verify functionality. Sufficient time margin is available in the station accident analysis to account for the amount of time delay allowed by the Reference 1 methodology.

For the changes dealing with moving the surveillance requirement for ECCS RESPONSE TIME testing from the Instrumentation section to the System section of the Technical Specifications, no change in testing requirements (other than the elimination of the instrument loops implemented as part of the Reference 1 change) has been introduced. The relaxation in Applicability does not increase the probability or the consequences of an accident previously evaluated, since there are no design basis events which credit ECCS during MODES 4 and 5.

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

Operation of WNP-2 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment only applies to the testing requirement for the components identified and does not result in any physical change to these or other components or their operation. The changes do not affect the capability of the associated systems to perform their intended function within the acceptable limits assumed in plant safety analyses and required for successful mitigation of an initiating event. The proposed amendment does not change the way in which any plant systems are operated or create the possibility of a new or different kind of accident. As a result, no new failure modes are introduced.

The two categories of components referenced above which are not included in the Reference 1 component list have no postulated functions or affects which may contribute to the initiation of an accident.

The proposed amendment represents reliance on a different, and previously staff approved, method to verify selected components remain fully functional and will not create the possibility of a new or different kind of accident from any accident previously evaluated.

REQUEST FOR AMENDMENT TO OPERATING LICENSE REGARDING TECHNICAL SPECIFICATION RESPONSE TIME TESTING

Attachment 3
Page 3 of 3

Operation of WNP-2 in accordance with the proposed amendment change will not involve a significant reduction in the margin of safety.

The current response times are based on the maximum allowable values assumed in the plant safety analyses. These analyses conservatively establish the margin of safety. As described above, the reliance on an alternate methodology for instrument response verification (Reference 1) will not affect the capability of the associated systems to perform their intended function within the allowed response time used as the basis for the plant safety analyses.

The two categories of components referenced above which are not included in the Reference 1 component list are qualitatively tested periodically by channel calibrations, CFTs and LSFTs. This testing verifies the proper function and response of these components. Adequate time margins have been verified to be available within the applicable analyses which enable qualitative assessment of the proper performance of these devices.

Plant and system response to an initiating event will remain in compliance with the assumptions of the safety analyses, and therefore the margin of safety is not affected.

Reference:

1. GE Nuclear Energy, BWR Owners' Group Licensing Topical Report, NEDO-32291-A, "System Analysis for the Elimination of Selected Response Time Testing Requirements," October, 1995.

ENVIRONMENTAL CONSIDERATIONS

Based on the above evaluation, this proposed change to the license does not result in a significant hazards considerations. In addition, the proposed change does not create a potential for a significant change in the types, or a significant increase in the amount of any effluent that may be released offsite, nor does the change involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the amendment meets the eligibility criteria for a categorical exclusion as set forth in 10CFR51.22(c)(9). Therefore, in accordance with 10CFR51.22(b), an environmental assessment of this amendment is not required.

