ATTACHMENT 2 TO AEP:NRC:1265

CURRENT PAGES MARKED-UP TO REFLECT PROPOSED CHANGES
TO TECHNICAL SPECIFICATIONS

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - $T_{avg} \geq 350°F$

LIMITING CONDITION FOR OPERATION

3.5.2 Two independent ECCS subsystems shall be OPERABLE with each subsystem comprised of:

a. One OPERABLE centrifugal charging pump,

b. One OPERABLE safety injection pump,*

c. One OPERABLE residual heat removal heat exchanger,

d. One OPERABLE residual heat removal pump, and

e. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a safety injection signal and transferring suction to the containment sump during the recirculation phase of operation.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

* During accumulator fill evolutions, the safety injection pumps do not have to be declared inoperable.

ACCUMULATORS (Continued)

allowed completion times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

If more than one accumulator is inoperable, the plant is in a condition outside the accident analyses; therefore, LCO 3.0.3 must be entered immediately.

3/4.5.2 and 3/4.5.3 ECCS SUBSYSTEMS

The OPERABILITY of two independent ECCS subsystems ensures that sufficient emergency core cooling capability will be available in the event of a LOCA assuming the loss of one subsystem through any single failure consideration. Either subsystem operating in conjunction with the accumulators is capable of supplying sufficient core cooling to limit the peak cladding temperatures within acceptable limits for all postulated break sizes ranging from the double ended break of the largest RCS cold leg pipe downward. In addition, each ECCS subsystem provides long term core cooling capability in the recirculation mode during the accident recovery period.

INSERT "A"

Insert "A"

During accumulator fill evolutions, the safety injection pumps do not have to be declared inoperable. Analysis was performed to determine the potential impact of the additional flow through the accumulator fill line if an accident should occur while the fill evolution was in progress. It was determined that the only accident scenario of concern was the large break LOCA. Under a specific and restricted set of conditions, it would be possible to experience runout of the in-service SI pump. However, the analysis determined that the probability of a large break LOCA occurring during the fill evolution is not a credible event. Based on this, it was determined that it was not necessary to reposition the SI and RHR crosstie valves, or declare ECCS pumps inoperable to perform the fill evolution.

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f. All safety injection cross-tie valves open.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one ECCS subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

b. With a safety injection cross-tie valve closed, restore the cross-tie valve to the open position or reduce the core power level to less than or equal to 3250 MW within one hour. Specification 3.0.4 does not apply.

c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

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If a safety injection cross-tie valve is closed, safety injection would be limited to two lines assuming the loss of one safety injection subsystem through a single failure consideration. The resulting lowered flow requires a decrease in THERMAL POWER to limit the peak clad temperature within acceptable limits in the event of a postulated small break LOCA.

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ATTACHMENT 3 TO AEP:NRC:1265

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

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3/4.5.1 ACCUMULATORS (Continued)

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