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January 4, 2018

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Brunswick Steam Electric Plant, Unit Nos. 1 and 2
Renewed Facility Operating License Nos. DPR-71 and DPR-62
Docket Nos. 50-325 and 50-324
Response to Request for Additional Information Regarding Application to Revise Technical Specifications to Adopt TSTF-542, *Reactor Pressure Vessel Water Inventory Control*

References:

1. Letter from William R. Gideon (Duke Energy) to the U.S. Nuclear Regulatory Commission Document Control Desk, *Application to Revise Technical Specifications to Adopt TSTF-542, Reactor Pressure Vessel Water Inventory Control,* dated June 29, 2017, ADAMS Accession Number ML17180A538

2. Letter from Farideh E. Saba (NRC) to William R. Gideon (Duke Energy), *Request for Additional Information Related to License Amendment Request to Revise Technical Specifications to Adopt TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control"*, dated December 4, 2017, ADAMS Accession Number ML17317B002

Ladies and Gentlemen:

By letter dated June 29, 2017 (i.e., Reference 1), Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment requested to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, *Reactor Pressure Vessel Water Inventory Control*, Revision 2.

On December 4, 2017 (i.e., Reference 2), the NRC provided a request for additional information (RAI) regarding the LAR. Duke Energy's response to the RAI is enclosed.

This document contains no new regulatory commitments.

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on January 4, 2018.

Sincerely,

William R. Gideon

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Enclosure: Response to Request for Additional Information

Attachment 1: Proposed Technical Specification Changes (Mark-Up) - Unit 1
Attachment 2: Proposed Technical Specification Changes (Mark-Up) - Unit 2
Attachment 3: Revised (Typed) Technical Specification Pages - Unit 1
Attachment 4: Revised (Typed) Technical Specification Pages - Unit 2

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Response to Request for Additional Information

By letter dated June 29, 2017, Duke Energy Progress, LLC (Duke Energy), submitted a license amendment request (LAR) for the Brunswick Steam Electric Plant (BSEP), Unit Nos. 1 and 2. The proposed amendment requested to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, *Reactor Pressure Vessel Water Inventory Control*, Revision 2.

On December 4, 2017, the NRC provided a request for additional information (RAI) regarding the LAR. Duke Energy's responses, are provided below.

BSEP-RAI-1

TSTF-542, Revision 2, Surveillance Requirement (SR) 3.5.2.8 states: "Verify the required ECCS [emergency core cooling system] injection/spray subsystem actuates on a manual initiation signal." In Section 2.2, "Variations," of Enclosure 1 to the license amendment request (LAR), the licensee provided the following variation and justification, in part:

> STS [Standard Technical Specifications] Table 3.3.5.1-1, Function 1.e, and 2.h, "Manual Initiation," for the Core Spray (CS) System and Low Pressure Coolant Injection (LPCI) System are not included in the BSEP TSs. Therefore, manual initiation functions for LPCI and CS are not being included in TS 3.3.5.3, Table 3.3.5.3-1. As a result of this design, proposed BSEP SR 3.5.2.8 is modified from the STS SR 3.5.2.8 to verification that the required ECCS injection/spray subsystem can be manually operated versus verifying that the subsystem actuates on a manual initiation signal.

The licensee further stated that:

> Since the LPCI and CS subsystems can be placed in service using manual means in a short period of time (i.e., within the timeframes assumed in the development of TSTF-542), using controls and indications that are readily available in the Main Control Room, manual operation of the required subsystem would be an equivalent alternative to system initiation via manual initiation logic.

However, it is not clear what type of manual operation is available or being used in the main control room that can provide actuation of the ECCS injection/spray subsystems.

(a) Clarify whether the Brunswick design includes a pushbutton(s) or hand switch(s) for actuation of the ECCS subsystems.

(b) Provide additional details and justification that supports use of the proposed alternative that includes manually aligning CS and LPCI components for injection and the associated timing of these actions.

Response

Part (a)

ECCS subsystems at BSEP, by design, do not include a single manual pushbutton or hand switch that activates a manual ECCS initiation.

Part(b)

In Modes 4 or 5, alignment of either the Core Spray (CS) System or the Residual Heat Removal (RHR) system from the normal standby system alignment consists of starting the associated Core Spray or RHR pump and opening of the injection valve. Both manipulations are performed from the control room. Guidance is provided in plant procedures 1(2)OP-18, *Core Spray Operating Procedure*, and 1(2)OP-17, *Residual Heat Removal System Operating Procedure*.

A Core Spray subsystem can also be credited for serving the ECCS function in Modes 4 or 5 when the suction is aligned to the Condensate Storage Tank (CST). Manually aligning the system for ECCS injection would also consist of starting the associated CS pump and opening of the injection valve. Both manipulations are performed from the control room. Guidance is provided in plant procedure 1(2)OP-18.

In Modes 4 or 5, a Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operations for decay heat removal if capable of being manually realigned and not otherwise inoperable. In this case, Shutdown Cooling is first secured by closing the injection valve and securing the operating pump. Once the pump is secured, suction flowpaths would be transferred from the reactor to the suppression pool, and heat exchanger inlet, outlet, and bypass valves would be fully opened. Once this flowpath is established, injection can be started by starting the associated RHR pump and opening the injection valve. Manipulations are performed from the control room. Guidance is provided in plant procedure 1(2)OP-17.

As described above, the necessary alignments are accomplished from the control room. The required actions are contained in approved plant procedures and Operators are fully trained on the use of these procedures. TSTF-542 and the associated NRC safety evaluation for TSTF-542 recognize that a draining event is a slow evolution when compared to a design basis loss of coolant accident (LOCA), which is assumed to occur at full power, and thus there is adequate time to take manual actions (i.e., hours versus minutes). The manual actions described above can be accomplished in approximately 20 minutes, consistent with the TSTF-542 justification.

BSEP-RAI-2

In the proposed new Brunswick TS 3.3.5.3 (Brunswick TS page 3.3-48b of Enclosures 2 and 3 of the license amendment request), the note below "SURVEILLANCE REQUIREMENTS" is entitled "NOTES." Since there is only one note, the title should state "NOTE." Revise this TS page accordingly, or provide an explanation.

Response

TS page 3.3-48b has been revised. Marked-up and typed pages for both Unit 1 and Unit 2 are provided in Attachments 1 through 4 of this enclosure.

BSEP-RAI-3

The allowable value (AV) in the current TS Table 3.3.5.1-1, Function 1.a (Core Spray System - Reactor Steam Dome Pressure - Low) and Function 2.a (Low Pressure Coolant Injection System - Reactor Steam Dome Pressure - Low) are ≥ 402 pounds per square inch gauge (psig) and ≤ 425 psig. This is consistent with STS Table 3.3.5.1-1 with an AV range of [≥ 390 psig and

≤ 500 psig]. In TSTF-542, these functions are moved to STS Table 3.3.5.2-1 with an upper-end AV of [≤ 500 psig]. Also, TSTF-542, Revision 2 (page 41), states:

- In LCO 3.3.5.2A, the allowable value is revised to eliminate the low pressure limit to retain the high pressure limit. The RPV is well below the lower limit in Modes 4 and 5 so the low pressure limit is not needed.

However, in the proposed Brunswick Table 3.3.5.3-1 (page 3.3-48c), Function 1.a and Function 2.a, AVs are ≥ 402 psig, which is the lower limit for Brunswick. Revise the proposed changes to be consistent with TSTF-542, Revision 2, or provide a technical justification for this variation.

Response

TS page 3.3-48c has been revised. Marked up and typed pages for both Unit 1 and Unit 2 are provided in Attachments 1 through 4 of this enclosure.

BSEP-RAI-4

The licensee stated, in Section 2.2, "Variations," of Enclosure 1 to the LAR, in part, the following variation and justification:

> STS Table 3.3.5.1-1, Function 1.d, "Core Spray Pump Discharge Flow - Low," and Function 2.g, "Low Pressure Coolant Injection Pump- Discharge Flow - Low," are not included in the BSEP TSs. Also, STS Table 3.3.5.1-1, Function 1.e, and 2.h, "Manual Initiation," for the CS System and LPCI System are not included in the BSEP TSs. Therefore, they are not being included in TS 3.3.5.3, "Reactor Pressure Vessel (RPV) Water Inventory Control," Table 3.3.5.3-1. As a result of this design, BSEP TS 3.3.5.3 does not contain a Condition equivalent to STS 3.3.5.2, Condition D.

Furthermore, TSTF-542, Revision 2, relocates the CS and LPCI pump discharge flow-low requirements from STS Table 3.3.5.1-1, "Emergency Core Cooling System Instrumentation," to revised STS Table 3.3.5.2-1, "RPV Water Inventory Control Instrumentation." In particular, Section 3.3.4.2 of the TSTF-542, Revision 2, describes the purpose of the STS requirement:

> The minimum flow instruments are provided to protect the associated low pressure ECCS pump from overheating when the pump is operating and the associated injection valve is not fully open. The minimum flow line valve is opened when low flow is sensed, and the valve is automatically closed when the flow rate is adequate to protect the pump.

The presence or absence of a requirement in a current TS is not in and of itself justification for the deviation from the TSTF-542, Revision 2.

Provide technical justifications (i.e., a discussion of the differences) for not including the equivalent of CS and LPCI pump discharge flow-low functions as described in TSTF-542, STS Table 3.3.5.2-1, in the proposed Brunswick TS Table 3.3.5.3-1, or revise the proposed changes to include the functions along with a variation describing the technical justification for proposing to add the requirements to the Brunswick TSs.

Response

TSTF-542 justification Section 3.3.4.2 states:

> One channel of the Pump Discharge Flow - Low Function is required to be operable in Modes 4 and 5 when the associated Core Spray or LPCI pump is required to be operable by LCO 3.5.2 to ensure the pumps are capable of injecting into the Reactor Pressure Vessel when manually initiated.

STS Table 3.3.5.1-1, Function 1.d, *Core Spray Pump Discharge Flow - Low*, and Function 2.g, *Low Pressure Coolant Injection Pump- Discharge Flow - Low*, support the manual initiation via single manual pushbutton or hand switch of CS and LPCI. As discussed in response to BSEP-RAI-1, ECCS subsystems at BSEP, by design, do not include a single manual pushbutton or hand switch that activates a manual ECCS initiation. As a result, the corresponding support functions are not included in the current BSEP TS and are not proposed to be added with the adoption of TSTF-542.

As described in response to BSEP-RAI-1, the necessary alignments are accomplished from the control room. The required actions, including pump discharge minimum flow considerations, are contained in approved plant procedures and Operators are fully trained on the use of these procedures. Therefore, the manual operating procedures provide adequate pump protection.

BSEP-RAI-5

Proposed TS 3.5.2, Required Action E.1 (BSEP TS page 3.5-10) states:

> Initiate action to restore Drain Time to ≥ 36 hours.

Since "Drain Time" is a proposed defined term in BSEP TS 1.1, "Definitions," it should be capitalized, consistent with the Brunswick convention for defined terms throughout TSs. Revise the proposed change for consistency or provide a justification for this variation.

Response

TS page 3.5-10 has been revised. Marked up and typed pages for both Unit 1 and Unit 2 are provided in Attachments 1 through 4 of this enclosure.

BSEP-RAI-6

The licensee proposed on Brunswick TS page 3.5-12 of Enclosures 2 and 3 to the LAR deletion of SR 3.5.2.7 that is associated with the ECCS response time for each required ECCS injection/spray subsystem. This is a plant-specific change since it is not included in TSTF-542, Revision 2. Provide technical justifications that support deletion of SR 3.5.2.7.

Response

The deletion of SR 3.5.2.7 is consistent with the TSTF-542, NUREG-1433 STS 3.5.2, *RPV Water Level Control*, which does not include a response time testing surveillance requirement. The BSEP TSs are based on NUREG-1433 and the proposed change is consistent with the NUREG-1433 STS 3.5.2. Deletion of BSEP SR 3.5.2.7 is acceptable because the purpose of the SR is to ensure that the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is less than or equal to the maximum value assumed in the accident analysis. However, a

draining event in Mode 4 or 5 is not an analyzed accident and, therefore, there are no accident analysis assumptions on response time and the safety function is achieved through manual injection. A potential draining event in Modes 4 and 5 is a slower event than a LOCA. Elimination of SR 3.5.2.7 is analogous to elimination of ECCS Response Time and Isolation System Response time testing addressed in Section 3.4.5, *Proposed TS 3.3.5.2 Surveillances for NUREG-1433 and NUREG-1434*, of the NRC's safety evaluation for TSTF-542.

BSEP-RAI-7

Proposed Brunswick TS 3.3.5.3, Condition D, states (Brunswick TS page 3.3.48b):

> Required Action and associated Completion Time of Condition C or D not met.

This appears to be an editorial error since Condition D should not state "or D". Correct this error or provide justification that "Condition C or D" is correct under the proposed Condition D.

Response

TS page 3.3-48b has been revised. Marked up and typed pages for both Unit 1 and Unit 2 are provided in Attachments 1 through 4 of this enclosure.

Proposed Technical Specification Changes (Mark-Up)
Unit 1

Insert 2
New TS 3.3.5.3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Insert 2
New TS 3.3.5.3

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

		AND	
		D.3 Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
		AND	
		D.42 Initiate action to verify restore one standby gas treatment subsystem is capable of being placed in operation.to OPERABLE status.	Immediately
		AND	
		D.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore DRAIN TIME to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program

(continued)

Proposed Technical Specification Changes (Mark-Up)
Unit 2

Insert 2
New TS 3.3.5.3

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Insert 2
New TS 3.3.5.3

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

		AND	
		D.3 Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
		AND	
		D.42 Initiate action to verify restore one standby gas treatment subsystem is capable of being placed in operation.to OPERABLE status.	Immediately
		AND	
		D.3 Initiate action to restore isolation capability in each required secondary containment penetration flow path not isolated.	
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore DRAIN TIME to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program

(continued)

Revised (Typed) Technical Specification Pages
Unit 1

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
D. (continued)	D.3	Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room.	Immediately
	AND		
	D.4	Initiate action to verify one standby gas treatment subsystem is capable of being placed in operation.	Immediately
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1	Initiate action to restore DRAIN TIME to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.2	Verify, for a required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program

(continued)

Revised (Typed) Technical Specification Pages
Unit 2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition C not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

---NOTE---

Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.

SURVEILLANCE		FREQUENCY
SR 3.3.5.3.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.3.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

Table 3.3.5.3-1 (page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low	4, 5	4	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≤ 425 psig
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low Level 1	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 153 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Level 2	(a)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 101 inches

(a) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. (continued)	D.3 Initiate action to isolate each secondary containment penetration flow path or verify it can be manually isolated from the control room. AND	Immediately
	D.4 Initiate action to verify one standby gas treatment subsystem is capable of being placed in operation.	Immediately
E. Required Action and associated Completion Time of Condition C or D not met. OR DRAIN TIME < 1 hour.	E.1 Initiate action to restore DRAIN TIME to ≥ 36 hours.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.5.2.1	Verify DRAIN TIME ≥ 36 hours.	In accordance with the Surveillance Frequency Control Program
SR 3.5.2.2	Verify, for a required low pressure coolant injection (LPCI) subsystem, the suppression pool water level is ≥ -31 inches.	In accordance with the Surveillance Frequency Control Program

(continued)