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TSB2 - TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

REMOVE MANUAL TABLE OF CONTENTS DATE: 12/05/2018

ADD MANUAL TABLE OF CONTENTS DATE: 01/03/2019

CATEGORY: DOCUMENTS TYPE: TSB2

ID: TEXT 3.0

ADD: REV: 4

REMOVE: REV:3

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CATEGORY: DOCUMENTS TYPE: TSB2
ID: TEXT 3.5.2
REMOVE: REV:3

ADD: REV: 4

CATEGORY: DOCUMENTS TYPE: TSB2
ID: TEXT LOES
ADD: REV: 138

REMOVE: REV:137

CATEGORY: DOCUMENTS TYPE: TSB2
ID: TEXT TOC
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SSS MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

Table Of Contents

Issue Date: 01/03/2019

| <u>Procedure Name</u> | <u>Rev</u> | <u>Issue Date</u> | <u>Change ID</u> | <u>Change Number</u> |
|---|------------|-------------------|------------------|----------------------|
| TEXT LOES | 138 | 01/03/2019 | | |
| Title: LIST OF EFFECTIVE SECTIONS | | | | |
| TEXT TOC | 24 | 01/03/2019 | | |
| Title: TABLE OF CONTENTS | | | | |
| TEXT 2.1.1 | 5 | 01/22/2015 | | |
| Title: SAFETY LIMITS (SLS) REACTOR CORE SLS | | | | |
| TEXT 2.1.2 | 1 | 10/04/2007 | | |
| Title: SAFETY LIMITS (SLS) REACTOR COOLANT SYSTEM (RCS) PRESSURE SL | | | | |
| TEXT 3.0 | 4 | 01/03/2019 | | |
| Title: LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY | | | | |
| TEXT 3.1.1 | 1 | 03/24/2005 | | |
| Title: REACTIVITY CONTROL SYSTEMS SHUTDOWN MARGIN (SDM) | | | | |
| TEXT 3.1.2 | 0 | 11/18/2002 | | |
| Title: REACTIVITY CONTROL SYSTEMS REACTIVITY ANOMALIES | | | | |
| TEXT 3.1.3 | 3 | 11/16/2016 | | |
| Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD OPERABILITY | | | | |
| TEXT 3.1.4 | 5 | 11/16/2016 | | |
| Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM TIMES | | | | |
| TEXT 3.1.5 | 2 | 11/16/2016 | | |
| Title: REACTIVITY CONTROL SYSTEMS CONTROL ROD SCRAM ACCUMULATORS | | | | |
| TEXT 3.1.6 | 4 | 11/16/2016 | | |
| Title: REACTIVITY CONTROL SYSTEMS ROD PATTERN CONTROL | | | | |

SSS MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.1.7 4 11/16/2016

Title: REACTIVITY CONTROL SYSTEMS STANDBY LIQUID CONTROL (SLC) SYSTEM

TEXT 3.1.8 4 11/16/2016

Title: REACTIVITY CONTROL SYSTEMS SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES

TEXT 3.2.1 5 11/16/2016

Title: POWER DISTRIBUTION LIMITS AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)

TEXT 3.2.2 4 11/16/2016

Title: POWER DISTRIBUTION LIMITS MINIMUM CRITICAL POWER RATIO (MCPR)

TEXT 3.2.3 3 11/16/2016

Title: POWER DISTRIBUTION LIMITS LINEAR HEAT GENERATION RATE LHGR

TEXT 3.3.1.1 6 11/16/2016

Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) INSTRUMENTATION

TEXT 3.3.1.2 4 01/23/2018

Title: INSTRUMENTATION SOURCE RANGE MONITOR (SRM) INSTRUMENTATION

TEXT 3.3.2.1 4 11/16/2016

Title: INSTRUMENTATION CONTROL ROD BLOCK INSTRUMENTATION

TEXT 3.3.2.2 3 11/16/2016

Title: INSTRUMENTATION FEEDWATER - MAIN TURBINE HIGH WATER LEVEL TRIP INSTRUMENTATION

TEXT 3.3.3.1 9 11/16/2016

Title: INSTRUMENTATION POST ACCIDENT MONITORING (PAM) INSTRUMENTATION

TEXT 3.3.3.2 2 11/16/2016

Title: INSTRUMENTATION REMOTE SHUTDOWN SYSTEM

TEXT 3.3.4.1 2 11/16/2016

Title: INSTRUMENTATION END OF CYCLE RECIRCULATION PUMP TRIP (EOC-RPT) INSTRUMENTATION

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.3.4.2 1 11/16/2016

Title: INSTRUMENTATION ANTICIPATED TRANSIENT WITHOUT SCRAM RECIRCULATION PUMP TRIP
(ATWS-RPT) INSTRUMENTATION

TEXT 3.3.5.1 6 11/16/2016

Title: INSTRUMENTATION EMERGENCY CORE COOLING SYSTEM (ECCS) INSTRUMENTATION

TEXT 3.3.5.2 1 11/16/2016

Title: INSTRUMENTATION REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM INSTRUMENTATION

TEXT 3.3.6.1 8 11/16/2016

Title: INSTRUMENTATION PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.6.2 5 11/16/2016

Title: INSTRUMENTATION SECONDARY CONTAINMENT ISOLATION INSTRUMENTATION

TEXT 3.3.7.1 3 11/16/2016

Title: INSTRUMENTATION CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM
INSTRUMENTATION

TEXT 3.3.8.1 4 11/16/2016

Title: INSTRUMENTATION LOSS OF POWER (LOP) INSTRUMENTATION

TEXT 3.3.8.2 1 11/16/2016

Title: INSTRUMENTATION REACTOR PROTECTION SYSTEM (RPS) ELECTRIC POWER MONITORING

TEXT 3.4.1 5 11/16/2016

Title: REACTOR COOLANT SYSTEM (RCS) RECIRCULATION LOOPS OPERATING

TEXT 3.4.2 4 11/16/2016

Title: REACTOR COOLANT SYSTEM (RCS) JET PUMPS

TEXT 3.4.3 3 01/13/2012

Title: REACTOR COOLANT SYSTEM (RCS) SAFETY/RELIEF VALVES (S/RVS)

TEXT 3.4.4 1 11/16/2016

Title: REACTOR COOLANT SYSTEM (RCS) RCS OPERATIONAL LEAKAGE

○

1

Report Date: 01/07/19



SSS MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.6.1.3 16 04/19/2017

Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT ISOLATION VALVES (PCIVS)

TEXT 3.6.1.4 2 11/16/2016

Title: CONTAINMENT SYSTEMS CONTAINMENT PRESSURE

TEXT 3.6.1.5 2 11/16/2016

Title: CONTAINMENT SYSTEMS DRYWELL AIR TEMPERATURE

TEXT 3.6.1.6 1 11/16/2016

Title: CONTAINMENT SYSTEMS SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

TEXT 3.6.2.1 3 11/16/2016

Title: CONTAINMENT SYSTEMS SUPPRESSION POOL AVERAGE TEMPERATURE

TEXT 3.6.2.2 1 11/16/2016

Title: CONTAINMENT SYSTEMS SUPPRESSION POOL WATER LEVEL

TEXT 3.6.2.3 2 11/16/2016

Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL COOLING

TEXT 3.6.2.4 1 11/16/2016

Title: CONTAINMENT SYSTEMS RESIDUAL HEAT REMOVAL (RHR) SUPPRESSION POOL SPRAY

TEXT 3.6.3.1 2 06/13/2006

Title: CONTAINMENT SYSTEMS INTENTIONALLY LEFT BLANK

TEXT 3.6.3.2 3 09/29/2017

Title: CONTAINMENT SYSTEMS DRYWELL AIR FLOW SYSTEM

TEXT 3.6.3.3 3 09/29/2017

Title: CONTAINMENT SYSTEMS PRIMARY CONTAINMENT OXYGEN CONCENTRATION

TEXT 3.6.4.1 15 07/05/2018

Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.6.4.2 13 04/24/2018

Title: CONTAINMENT SYSTEMS SECONDARY CONTAINMENT ISOLATION VALVES (SCIVS)

TEXT 3.6.4.3 6 09/15/2017

Title: CONTAINMENT SYSTEMS STANDBY GAS TREATMENT (SGT) SYSTEM

TEXT 3.7.1 7 03/01/2017

Title: PLANT SYSTEMS RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) SYSTEM AND THE
ULTIMATE HEAT SINK (UHS)

TEXT 3.7.2 3 11/16/2016

Title: PLANT SYSTEMS EMERGENCY SERVICE WATER (ESW) SYSTEM

TEXT 3.7.3 3 09/15/2017

Title: PLANT SYSTEMS CONTROL ROOM EMERGENCY OUTSIDE AIR SUPPLY (CREOAS) SYSTEM

TEXT 3.7.4 1 11/16/2016

Title: PLANT SYSTEMS CONTROL ROOM FLOOR COOLING SYSTEM

TEXT 3.7.5 2 11/16/2016

Title: PLANT SYSTEMS MAIN CONDENSER OFFGAS

TEXT 3.7.6 4 11/16/2016

Title: PLANT SYSTEMS MAIN TURBINE BYPASS SYSTEM

TEXT 3.7.7 2 11/16/2016

Title: PLANT SYSTEMS SPENT FUEL STORAGE POOL WATER LEVEL

TEXT 3.7.8 1 11/16/2016

Title: MAINE TURBINE PRESSURE REGULATION SYSTEM

TEXT 3.8.1 11 02/27/2018

Title: ELECTRICAL POWER SYSTEMS AC SOURCES - OPERATING

TEXT 3.8.2 0 11/18/2002

Title: ELECTRICAL POWER SYSTEMS AC SOURCES - SHUTDOWN

SSS MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

| | | |
|---|---|------------|
| TEXT 3.8.3 | 6 | 12/14/2017 |
| Title: ELECTRICAL POWER SYSTEMS DIESEL FUEL OIL LUBE OIL AND STARTING AIR | | |
| TEXT 3.8.4 | 4 | 11/16/2016 |
| Title: ELECTRICAL POWER SYSTEMS DC SOURCES - OPERATING | | |
| TEXT 3.8.5 | 1 | 12/14/2006 |
| Title: ELECTRICAL POWER SYSTEMS DC SOURCES - SHUTDOWN | | |
| TEXT 3.8.6 | 2 | 11/16/2016 |
| Title: ELECTRICAL POWER SYSTEMS BATTERY CELL PARAMETERS | | |
| TEXT 3.8.7 | 6 | 03/01/2017 |
| Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - OPERATING | | |
| TEXT 3.8.8 | 1 | 11/16/2016 |
| Title: ELECTRICAL POWER SYSTEMS DISTRIBUTION SYSTEMS - SHUTDOWN | | |
| TEXT 3.9.1 | 1 | 11/16/2016 |
| Title: REFUELING OPERATIONS REFUELING EQUIPMENT INTERLOCKS | | |
| TEXT 3.9.2 | 2 | 11/16/2016 |
| Title: REFUELING OPERATIONS REFUEL POSITION ONE-ROD-OUT INTERLOCK | | |
| TEXT 3.9.3 | 1 | 11/16/2016 |
| Title: REFUELING OPERATIONS CONTROL ROD POSITION | | |
| TEXT 3.9.4 | 0 | 11/18/2002 |
| Title: REFUELING OPERATIONS CONTROL ROD POSITION INDICATION | | |
| TEXT 3.9.5 | 1 | 11/16/2016 |
| Title: REFUELING OPERATIONS CONTROL ROD OPERABILITY - REFUELING | | |
| TEXT 3.9.6 | 2 | 11/16/2016 |
| Title: REFUELING OPERATIONS REACTOR PRESSURE VESSEL (RPV) WATER LEVEL | | |

SSES MANUAL

Manual Name: TSB2

Manual Title: TECHNICAL SPECIFICATIONS BASES UNIT 2 MANUAL

TEXT 3.9.7 1 11/16/2016

Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - HIGH WATER LEVEL

TEXT 3.9.8 1 11/16/2016

Title: REFUELING OPERATIONS RESIDUAL HEAT REMOVAL (RHR) - LOW WATER LEVEL

TEXT 3.10.1 1 01/23/2008

Title: SPECIAL OPERATIONS INSERVICE LEAK AND HYDROSTATIC TESTING OPERATION

TEXT 3.10.2 1 11/16/2016

Title: SPECIAL OPERATIONS REACTOR MODE SWITCH INTERLOCK TESTING

TEXT 3.10.3 1 11/16/2016

Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - HOT SHUTDOWN

TEXT 3.10.4 1 11/16/2016

Title: SPECIAL OPERATIONS SINGLE CONTROL ROD WITHDRAWAL - COLD SHUTDOWN

TEXT 3.10.5 1 11/16/2016

Title: SPECIAL OPERATIONS SINGLE CONTROL ROD DRIVE (CRD) REMOVAL - REFUELING

TEXT 3.10.6 1 11/16/2016

Title: SPECIAL OPERATIONS MULTIPLE CONTROL ROD WITHDRAWAL - REFUELING

TEXT 3.10.7 1 03/24/2005

Title: SPECIAL OPERATIONS CONTROL ROD TESTING - OPERATING

TEXT 3.10.8 3 11/16/2016

Title: SPECIAL OPERATIONS SHUTDOWN MARGIN (SDM) TEST - REFUELING

SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL SPECIFICATIONS BASES) –

SECTION DELETED

THIS PAGE INTENTIONALLY LEFT BLANK

TABLE OF CONTENTS (TECHNICAL SPECIFICATIONS BASES)

| | | |
|----------|---|---------|
| B2.0 | SAFETY LIMITS (SLs) | 2.0-1 |
| B2.1.1 | Reactor Core SLs | 2.0-1 |
| B2.1.2 | Reactor Coolant System (RCS) Pressure SL | 2.0-6 |
| B3.0 | LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY | 3.0-1 |
| B3.1 | REACTIVITY CONTROL SYSTEMS | 3.1-1 |
| B3.1.1 | Shutdown Margin (SDM) | 3.1-1 |
| B3.1.2 | Reactivity Anomalies | 3.1-8 |
| B3.1.3 | Control Rod OPERABILITY | 3.1-13 |
| B3.1.4 | Control Rod Scram Times | 3.1-22 |
| B3.1.5 | Control Rod Scram Accumulators | 3.1-29 |
| B3.1.6 | Rod Pattern Control | 3.1-34 |
| B3.1.7 | Standby Liquid Control (SLC) System | 3.1-39 |
| B3.1.8 | Scram Discharge Volume (SDV) Vent and Drain Valves | 3.1-47 |
| B3.2 | POWER DISTRIBUTION LIMITS | 3.2-1 |
| B3.2.1 | Average Planar Linear Heat Generation Rate (APLHGR) | 3.2-1 |
| B3.2.2 | Minimum Critical Power Ratio (MCPR) | 3.2-5 |
| B3.2.3 | Linear Heat Generation Rate (LHGR) | 3.2-10 |
| B3.3 | INSTRUMENTATION | 3.3-1 |
| B3.3.1.1 | Reactor Protection System (RPS) Instrumentation | 3.3-1 |
| B3.3.1.2 | Source Range Monitor (SRM) Instrumentation | 3.3-35 |
| B3.3.2.1 | Control Rod Block Instrumentation | 3.3-44 |
| B3.3.2.2 | Feedwater – Main Turbine High Water Level Trip Instrumentation | 3.3-55 |
| B3.3.3.1 | Post Accident Monitoring (PAM) Instrumentation | 3.3-64 |
| B3.3.3.2 | Remote Shutdown System | 3.3-76 |
| B3.3.4.1 | End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation | 3.3-81 |
| B3.3.4.2 | Anticipated Transient Without Scram Recirculation Pump Trip (ATWS-RPT) Instrumentation | 3.3-92 |
| B3.3.5.1 | Emergency Core Cooling System (ECCS) Instrumentation | 3.3-101 |
| B3.3.5.2 | Reactor Core Isolation Cooling (RCIC) System Instrumentation | 3.3-135 |
| B3.3.6.1 | Primary Containment Isolation Instrumentation | 3.3-147 |
| B3.3.6.2 | Secondary Containment Isolation Instrumentation | 3.3-180 |
| B3.3.7.1 | Control Room Emergency Outside Air Supply (CREOAS) System Instrumentation | 3.3-192 |

(continued)

TABLE OF CONTENTS (TECHNICAL SPECIFICATIONS BASES)

| | | |
|----------|---|---------|
| B3.3 | INSTRUMENTATION (continued) | |
| B3.3.8.1 | Loss of Power (LOP) Instrumentation | 3.3-206 |
| B3.3.8.2 | Reactor Protection System (RPS) Electric Power Monitoring | 3.3-214 |
| B3.4 | REACTOR COOLANT SYSTEM (RCS) | 3.4-1 |
| B3.4.1 | Recirculation Loops Operating | 3.4-1 |
| B3.4.2 | Jet Pumps | 3.4-10 |
| B3.4.3 | Safety/Relief Valves (S/RVs) | 3.4-15 |
| B3.4.4 | RCS Operational LEAKAGE | 3.4-19 |
| B3.4.5 | RCS Pressure Isolation Valve (PIV) Leakage | 3.4-24 |
| B3.4.6 | RCS Leakage Detection Instrumentation | 3.4-30 |
| B3.4.7 | RCS Specific Activity | 3.4-35 |
| B3.4.8 | Residual Heat Removal (RHR) Shutdown Cooling System – Hot Shutdown | 3.4-39 |
| B3.4.9 | Residual Heat Removal (RHR) Shutdown Cooling System – Cold Shutdown | 3.4-44 |
| B3.4.10 | RCS Pressure and Temperature (P/T) Limits | 3.4-49 |
| B3.4.11 | Reactor Steam Dome Pressure | 3.4-58 |
| B3.5 | EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM | 3.5-1 |
| B3.5.1 | ECCS – Operating | 3.5-1 |
| B3.5.2 | ECCS – Shutdown | 3.5-19 |
| B3.5.3 | RCIC System | 3.5-25 |
| B3.6 | CONTAINMENT SYSTEMS | 3.6-1 |
| B3.6.1.1 | Primary Containment | 3.6-1 |
| B3.6.1.2 | Primary Containment Air Lock | 3.6-7 |
| B3.6.1.3 | Primary Containment Isolation Valves (PCIVs) | 3.6-15 |
| B3.6.1.4 | Containment Pressure | 3.6-40 |
| B3.6.1.5 | Drywell Air Temperature | 3.6-43 |
| B3.6.1.6 | Suppression Chamber-to-Drywell Vacuum Breakers | 3.6-46 |
| B3.6.2.1 | Suppression Pool Average Temperature | 3.6-52 |
| B3.6.2.2 | Suppression Pool Water Level | 3.6-58 |
| B3.6.2.3 | Residual Heat Removal (RHR) Suppression Pool Cooling | 3.6-61 |
| B3.6.2.4 | Residual Heat Removal (RHR) Suppression Pool Spray | 3.6-65 |
| B3.6.3.1 | Not Used | 3.6-69 |
| B3.6.3.2 | Drywell Air Flow System | 3.6-75 |
| B3.6.3.3 | Primary Containment Oxygen Concentration | 3.6-80 |
| B3.6.4.1 | Secondary Containment | 3.6-83 |
| B3.6.4.2 | Secondary Containment Isolation Valves (SCIVs) | 3.6-90 |
| B3.6.4.3 | Standby Gas Treatment (SGT) System | 3.6-100 |

(continued)

TABLE OF CONTENTS (TECHNICAL SPECIFICATIONS BASES)

| | | |
|---------|--|---------|
| B3.7 | PLANT SYSTEMS..... | 3.7-1 |
| B3.7.1 | Residual Heat Removal Service Water (RHRSW) System and the Ultimate Heat Sink (UHS) | 3.7-1 |
| B3.7.2 | Emergency Service Water (ESW) System | 3.7-7 |
| B3.7.3 | Control Room Emergency Outside Air Supply (CREOAS) System | 3.7-12 |
| B3.7.4 | Control Room Floor Cooling System | 3.7-19 |
| B3.7.5 | Main Condenser Offgas..... | 3.7-24 |
| B3.7.6 | Main Turbine Bypass System..... | 3.7-27 |
| B3.7.7 | Spent Fuel Storage Pool Water Level | 3.7-31 |
| B3.7.8 | Main Turbine Pressure Regulation System | 3.7-34 |
| B3.8 | ELECTRICAL POWER SYSTEM..... | 3.8-1 |
| B3.8.1 | AC Sources – Operating..... | 3.8-1 |
| B3.8.2 | AC Sources – Shutdown | 3.8-39 |
| B3.8.3 | Diesel Fuel Oil, Lube Oil, and Starting Air | 3.8-47 |
| B3.8.4 | DC Sources – Operating | 3.8-56 |
| B3.8.5 | DC Sources – Shutdown | 3.8-70 |
| B3.8.6 | Battery Cell Parameters | 3.8-77 |
| B3.8.7 | Distribution Systems – Operating | 3.8-84 |
| B3.8.8 | Distribution Systems – Shutdown..... | 3.8-94 |
| B3.9 | REFUELING OPERATIONS | 3.9-1 |
| B3.9.1 | Refueling Equipment Interlocks..... | 3.9-1 |
| B3.9.2 | Refuel Position One-Rod-Out Interlock | 3.9-5 |
| B3.9.3 | Control Rod Position..... | 3.9-9 |
| B3.9.4 | Control Rod Position Indication | 3.9-12 |
| B3.9.5 | Control Rod OPERABILITY – Refueling..... | 3.9-16 |
| B3.9.6 | Reactor Pressure Vessel (RPV) Water Level..... | 3.9-19 |
| B3.9.7 | Residual Heat Removal (RHR) – High Water Level | 3.9-22 |
| B3.9.8 | Residual Heat Removal (RHR) – Low Water Level..... | 3.9-26 |
| B3.10 | SPECIAL OPERATIONS..... | 3.10-1 |
| B3.10.1 | Inservice Leak and Hydrostatic Testing Operation..... | 3.10-1 |
| B3.10.2 | Reactor Mode Switch Interlock Testing | 3.10-6 |
| B3.10.3 | Single Control Rod Withdrawal – Hot Shutdown | 3.10-11 |
| B3.10.4 | Single Control Rod Withdrawal – Cold Shutdown | 3.10-16 |
| B3.10.5 | Single Control Rod Drive (CRD) Removal – Refueling..... | 3.10-21 |
| B3.10.6 | Multiple Control Rod Withdrawal – Refueling | 3.10-26 |
| B3.10.7 | Control Rod Testing – Operating | 3.10-30 |
| B3.10.8 | SHUTDOWN MARGIN (SDM) Test – Refueling..... | 3.10-34 |

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

| | |
|------|--|
| LCOs | LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated. |
|------|--|

| | |
|-----------|--|
| LCO 3.0.1 | LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification). |
|-----------|--|

| | |
|-----------|--|
| LCO 3.0.2 | <p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> |
|-----------|--|

- | | |
|----|---|
| a. | Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and |
| b. | Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. |

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

(continued)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.2 (continued)

ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.10, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into actions would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time other conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

- LCO 3.0.3 LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:
- a. An associated Required Action and Completion Time is not met and no other Condition applies; or
 - b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.3 (continued)

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met.
- b. A Condition exists for which the Required Actions have now been performed.
- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 4 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 4, or other applicable MODE, is not reduced. For example, if MODE 2 is reached in 2 hours, then the time allowed for reaching MODE 3 is the next 11 hours, because the total time for reaching MODE 3 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, and 3, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 4 and 5 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.7, "Spent Fuel Storage Pool Water Level." LCO 3.7.7 has an Applicability of "During movement of irradiated fuel

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.3
(continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.7 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.7 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.4
(continued)

purposes of LCO 3.0.4 (b), must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.4 (continued)

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., [Containment Air Temperature, Containment Pressure, MCPR, Moderator Temperature Coefficient]) and may be applied to other Specifications based on NRC plant-specific approval.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2 or MODE 3, MODE 2 to MODE 3 or MODE 4, and MODE 3 to MODE 4.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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| LCO 3.0.4 (continued) | SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. |
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| LCO 3.0.5 | LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate: |
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- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

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| LCO 3.0.6 | LCO 3.0.6 establishes an exception to LCO 3.0.2 for supported systems that have a support system LCO specified in the Technical Specifications (TS). This |
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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.6 (continued)

exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the plant is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions. When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.11, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross division checks to identify a loss of safety function for those support systems that support safety systems are required. The cross division check verifies that the supported systems of the redundant OPERABLE support

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.6
(continued)

system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

This loss of safety function does not require the assumption of additional single failures or loss of offsite power or concurrent loss of emergency diesel generators. Since operation is being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

When a loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of safety function is solely due to a single TS support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately address the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.7
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The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO ACTIONS may direct the other LCOs' ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures of TRO 3.7.8 are followed. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control within the Technical Requirements Manual.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.8
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LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

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| SRs | SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated. |
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| SR 3.0.1 | <p>SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.</p> |
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Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

SR 3.0.1
(continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 800 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psi to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

SR 3.0.2
(continued)

performance of the Required Action on a "once per..." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

SR 3.0.3 (continued)

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on the time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix j, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. The risk impact should be managed through the program in place to

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

SR 3.0.3
(continued)

implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to Surveillance not being met in accordance with LCO 3.0.4.

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B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

SR 3.0.4
(continued)

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2 or MODE 3, MODE 2 to MODE 3 or MODE 4, and MODE 3 to MODE 4.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCOs Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

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

B 3.5.2 ECCS-Shutdown

BASES

BACKGROUND A description of the Core Spray (CS) System and the Low Pressure Coolant Injection (LPCI) mode of the Residual Heat Removal (RHR) System is provided in the Bases for LCO 3.5.1, "ECCS-Operating."

**APPLICABLE
SAFETY
ANALYSES** The ECCS performance is evaluated for the entire spectrum of break sizes for a postulated loss of coolant accident (LOCA). The long term cooling analysis following a design basis LOCA (Reference 1) demonstrates that only one low pressure ECCS injection /spray subsystem is required, post LOCA, to maintain adequate reactor vessel water level in the event of an inadvertent vessel draindown. It is reasonable to assume, based on engineering judgement, that while in MODES 4 and 5, one low pressure ECCS injection/spray subsystem can maintain adequate reactor vessel water level. To provide redundancy, a minimum of two low pressure ECCS injection/spray subsystems are required to be OPERABLE in MODES 4 and 5.

The low pressure ECCS subsystems satisfy Criterion 3 of the NRC Policy Statement (Ref. 2).

LCO Two low pressure ECCS injection/spray subsystems are required to be OPERABLE. The low pressure ECCS injection/spray subsystems consist of two CS subsystems and two LPCI subsystems. Each CS subsystem consists of two motor driven pumps, piping, and valves to transfer water from the suppression pool or condensate storage tank (CST) to the reactor pressure vessel (RPV). Each LPCI subsystem consists of one of the two motor driven pumps, piping, and valves to transfer water from the suppression pool to the RPV. Only a single LPCI pump is required per subsystem because of the larger injection capacity in relation to a CS subsystem. In MODES 4 and 5, the RHR System cross tie valves are not required to be closed.

(continued)

BASES

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| LCO (continued) | LPCI subsystems may be aligned for decay heat removal and considered OPERABLE for the ECCS function, if they can be manually realigned (remote or local) to the LPCI mode and are not otherwise inoperable. Because of low pressure and low temperature conditions in MODES 4 and 5, sufficient time will be available to manually align and initiate LPCI subsystem operation to provide core cooling prior to postulated fuel uncover. |
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| APPLICABILITY | OPERABILITY of the low pressure ECCS injection/spray subsystems is required in MODES 4 and 5 to ensure adequate coolant inventory and sufficient heat removal capability for the irradiated fuel in the core in case of an inadvertent draindown of the vessel. Requirements for ECCS OPERABILITY during MODES 1, 2, and 3 are discussed in the Applicability section of the Bases for LCO 3.5.1. ECCS subsystems are not required to be OPERABLE during MODE 5 with the spent fuel storage pool gates removed and the water level maintained at ≥ 22 ft. above the RPV flange. This provides sufficient coolant inventory to allow operator action to terminate the inventory loss prior to fuel uncover in case of an inadvertent draindown. |
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The Automatic Depressurization System is not required to be OPERABLE to be OPERABLE during MODES 4 and 5 because the RPV pressure is ≤ 150 psig, and the CS System and the LPCI subsystems can provide core cooling without any depressurization of the primary system.

The High Pressure Coolant Injection System is not required to be OPERABLE during MODES 4 and 5 since the low pressure ECCS injection/spray subsystems can provide sufficient flow to the vessel.

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| ACTIONS | <u>A.1 and B.1</u> |
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If any one required low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status in 4 hours. In this Condition, the remaining OPERABLE subsystem can provide sufficient vessel flooding capability to recover from an inadvertent

(continued)

BASES

ACTIONS

A.1 and B.1 (continued)

Vessel draindown. However, overall system reliability is reduced because a single failure in the remaining OPERABLE subsystem concurrent with a vessel draindown could result in the ECCS not being able to perform its intended function. The 4 hour Completion Time for restoring the required low pressure ECCS injection/spray subsystem to OPERABLE status is based on engineering judgement that considered the remaining available subsystem and the low probability of a vessel draindown event.

With the inoperable subsystem not restored to OPERABLE status in the required Completion Time, action must be immediately initiated to suspend operations with a potential for draining the reactor vessel (OPDRVs) to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended.

C.1, C.2, D.1, D.2, and D.3

With both of the required ECCS injection/spray subsystems inoperable, all coolant inventory makeup capability may be unavailable. Therefore, actions must immediately be initiated to suspend OPDRVs to minimize the probability of a vessel draindown and the subsequent potential for fission product release. Actions must continue until OPDRVs are suspended. One ECCS injection/spray subsystem must also be restored to OPERABLE status within 4 hours.

If at least one low pressure ECCS injection/spray subsystem is not restored to OPERABLE status within the 4 hour Completion Time, additional actions are required to minimize any potential fission product release to the environment. This includes ensuring secondary containment is OPERABLE; one standby gas treatment subsystem is OPERABLE; and secondary containment isolation capability (i.e., one isolation valve and associated instrumentation are OPERABLE or other acceptable administrative controls to assure isolation capability) in each secondary containment penetration flow path not isolated and required to be isolated to mitigate radioactivity releases. OPERABILITY may be verified by an administrative check, or by examining logs or other information, to determine whether the components are out of

(continued)

BASES

ACTIONS C.1, C.2, D.1, D.2, and D.3 (continued)

service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the components. If, however, any required component is inoperable, then it must be restored to OPERABLE status. In this case, the Surveillance may need to be performed to restore the component to OPERABLE status. Actions must continue until all required components are OPERABLE.

The 4 hour Completion Time to restore at least one low pressure ECCS injection/spray subsystem to OPERABLE status ensures that prompt action will be taken to provide the required cooling capacity or to initiate actions to place the plant in a condition that minimizes any potential fission product release to the environment.

SURVEILLANCE SR 3.5.2.1 and SR 3.5.2.2
REQUIREMENTS

The minimum water level of 20 ft. 0 inches required for the suppression pool is periodically verified to ensure that the suppression pool will provide adequate net positive suction head (NPSH) for the CS System and LPCI subsystem pumps, recirculation volume, and vortex prevention. With the suppression pool water level less than the required limit, all ECCS injection/spray subsystems are inoperable unless they are aligned to an OPERABLE CST.

When suppression pool level is < 20 ft. 0 inches, the CS System is considered OPERABLE only if it can take suction from the CST, and the CST water level is sufficient to provide the required NPSH for the CS pump. Therefore, a verification that either the suppression pool water level is ≥ 20 ft. 0 inches or that CS is aligned to take suction from the CST and the CST contains $\geq 135,000$ gallons of water, equivalent to 49% of capacity, ensures that the CS System can supply at least 135,000 gallons of makeup water to the RPV. However, as noted, only one required CS subsystem may take credit for the CST option during OPDRVs. During OPDRVs, the volume in the CST may not provide adequate makeup if the RPV were completely drained. Therefore, only one CS subsystem is allowed to use the CST. This ensures

(continued)

BASES

SURVEILLANCE REQUIREMENTS SR 3.5.2.1 and SR 3.5.2.2 (continued)

the other required ECCS subsystem has adequate makeup volume.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.3, SR 3.5.2.5, SR 3.5.2.6, and SR 3.5.2.7

The Bases provided for SR 3.5.1.1, SR 3.5.1.7, SR 3.5.1.10, and SR 3.5.1.13 are applicable to SR 3.5.2.3, SR 3.5.2.5, SR 3.5.2.6 and SR 3.5.2.7, respectively.

SR 3.5.2.4

Verifying the correct alignment for manual, power operated, and automatic valves in the ECCS flow paths provides assurance that the proper flow paths will exist for ECCS operation. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since these valves were verified to be in the correct position prior to locking, sealing, or securing. A valve that receives an initiation signal is allowed to be in a nonaccident position provided the valve will automatically reposition in the proper stroke time. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of potentially being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves. The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

In MODES 4 and 5, the RHR System may operate in the shutdown cooling mode to remove decay heat and sensible heat from the reactor. Therefore, RHR valves that are required for LPCI

(continued)

BASES

SURVEILLANCE REQUIREMENTS SR 3.5.2.4 (continued)

subsystem operation may be aligned for decay heat removal. Therefore, this SR is modified by a Note that allows LPCI subsystems of the RHR System to be considered OPERABLE for the ECCS function if all the required valves in the LPCI flow path can be manually realigned (remote or local) to allow injection into the RPV, and the systems are not otherwise inoperable. This will ensure adequate core cooling if an inadvertent RPV draindown should occur.

- REFERENCES
1. FSAR, Section 6.3.2.
 2. Final Policy Statement on Technical Specifications Improvements, July 22, 1993 (58 FR 39132).
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