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NRC-19-0001

10 CFR 50.90

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

Fermi 2 Power Plant
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: License Amendment Request to Revise Technical Specification
3.3.5.3, Reactor Pressure Vessel (RPV) Water Inventory Control
Instrumentation

- References:
- 1) DTE Electric Letter to NRC, "Application to Revise Technical Specifications to Adopt TSTF-542, Reactor Pressure Vessel Water Inventory Control," NRC-17-0067, dated August 31, 2017 (ML17243A422)
 - 2) US NRC to Mr. Keith J. Polson, "Fermi 2 – Issuance of Amendment RE: Revision to Technical Specifications to Adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control," dated September 17, 2018 (ML18247A452)

In Reference 1, DTE Electric Company (DTE) submitted a license amendment request (LAR) to replace existing Technical Specifications (TS) requirements related to "operations with a potential for draining the reactor vessel" (OPDRVs) with new requirements on Reactor Pressure Vessel Water Inventory Control (RPV WIC) to protect Safety Limit 2.1.1.3. Reference 2 documents the associated NRC approval notice and safety evaluation.

During the first refueling outage following DTE's implementation of the TS approved in Reference 2, DTE identified an enhancement to TS 3.3.5.3, RPV Water Inventory Control Instrumentation. The proposed change is to provide a Note prior to the Surveillance Requirements (SR) section of TS 3.3.5.3 that allows delayed entry into the associated conditions and required actions when a channel is placed in an inoperable status solely for testing, provided the associated Function maintains Emergency Core Cooling System (ECCS) initiation capability. The SR note currently

a similar note to TS 3.3.5.3. Prior to adopting TSTF-542, the same SR note applied to Modes 4 and 5.

Enclosure 1 to this letter includes a description and assessment of the proposed changes including an analysis of the significant hazards considerations using the standards of 10 CFR 50.92. DTE has concluded that the changes proposed herein do not result in a significant hazards consideration. Enclosure 2 provides the existing TS pages marked to show the proposed changes. Enclosure 3 provides revised (clean) TS pages. Enclosure 4 provides a markup of the existing TS Bases pages. Changes to the existing TS Bases, consistent with the technical and regulatory analyses, will be implemented under the TS Bases Control Program. Enclosure 4 is provided for information only.

Approval of the proposed amendment is requested by February 27, 2020 to support implementation prior to the next refueling outage. Once approved, the amendment shall be implemented within 45 days.

No new commitments are being made in this submittal.

Should you have any questions or require additional information, please contact Mr. Scott A. Maglio, Manager – Nuclear Licensing, at (734) 586-5076.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 27, 2019

A handwritten signature in black ink, appearing to read 'P. Fessler', is written over a horizontal line.

Paul Fessler
Senior Vice President and CNO

- Enclosures:
1. Evaluation of the Proposed Change
 2. Proposed Technical Specification Changes (Mark-Up)
 3. Revised Technical Specification Pages
 4. Proposed TS Bases Changes (For Information Only)

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cc: NRC Project Manager
NRC Resident Office
Reactor Projects Chief, Branch 5, Region III
Regional Administrator, Region III
Michigan Public Service Commission
Regulated Energy Division (kindschl@michigan.gov)

**Enclosure 1 to
NRC-19-0001**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**License Amendment Request to Revise Technical Specification 3.3.5.3,
RPV Water Inventory Control Instrumentation**

Evaluation of the Proposed Change

Evaluation of the Proposed Change

Subject: License Amendment Request to Revise Technical Specification 3.3.5.3, Reactor Pressure Vessel (RPV) Water Inventory Control Instrumentation

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1.0 SUMMARY DESCRIPTION

The proposed amendment revises Technical Specification (TS) 3.3.5.3 and associated Bases for RPV Water Inventory Control Instrumentation by adding a note to the Surveillance Requirements section. The new note will allow delayed entry into the associated conditions and required actions when a channel is placed in an inoperable status solely for testing, provided the associated permissive Function maintains Emergency Core Cooling System (ECCS) initiation capability.

2.0 DETAILED DESCRIPTION

2.1 System Design and Operation

The Reactor Pressure Vessel (RPV) contains penetrations below the top of the active fuel (TAF) that have the potential to drain the reactor coolant inventory to below the TAF. If the water level should drop below the TAF, the ability to remove decay heat is reduced, which could lead to elevated cladding temperatures and clad perforation. Safety Limit 2.1.1.3 requires the RPV water level to be above the top of the active irradiated fuel at all times to prevent such elevated cladding temperatures. RPV water inventory control is required in Modes 4 and 5 to protect Safety Limit 2.1.1.3 and the fuel cladding barrier to prevent the release of radioactive material should a draining event occur. All requirements necessary to maintain RPV water level above TAF are contained in TS Section 1.1 definition, "DRAIN TIME," TS 3.3.5.3, Water Inventory Control Instrumentation, and TS 3.5.2, RPV Water Inventory Control.

2.2 Current Technical Specification Requirements

TS 3.3.5.3, RPV Water Inventory Control Instrumentation, requires each Function listed in TS Table 3.3.5.3-1 be OPERABLE. The purpose of the RPV Water Inventory Control Instrumentation is to support the requirements of LCO 3.5.2, RPV Water Inventory Control, and the definition of DRAIN TIME. TS Table 3.3.5.3-1 contains those instrumentation Functions that are required for manual initiation of the ECCS injection/spray subsystems required to be OPERABLE by LCO 3.5.2 and other functions that support automatic isolation of the Residual Heat Removal subsystem and the Reactor Water Cleanup system penetration flow paths on low RPV water level.

TS Table 3.3.5.3-1 Functions 1.a, Reactor Steam Dome Pressure – Low (Injection Permissive), for Core Spray and 2.a, Reactor Steam Dome Pressure – Low (Injection Permissive), for Low Pressure Coolant Injection are used as permissives for the low pressure ECCS injection/spray subsystem manual injection functions. These functions ensure that, prior to opening the injection valves of the low pressure ECCS subsystems, the reactor pressure has fallen to a value below these subsystems' maximum design pressure. While it is assured during MODES 4 and 5 that the reactor steam dome pressure will be below the ECCS maximum design pressure, the Reactor Steam Dome Pressure – Low (Injection Permissive) signals are assumed to be OPERABLE and capable of permitting initiation of the ECCS.

The Reactor Steam Dome Pressure – Low (Injection Permissive) signals are initiated from four pressure transmitters that sense the reactor steam dome pressure. The transmitters are connected to four trip units. The outputs of the trip units are connected to relays whose contacts are arranged in a one-out-of-two taken twice logic.

The four channels of Reactor Steam Dome Pressure – Low (Injection Permissive) Function are required to be OPERABLE in MODES 4 and 5 when ECCS manual initiation is required to be OPERABLE by LCO 3.5.2.

2.3 Reason for the Proposed Change

A Note in TS 3.3.5.1, ECCS Instrumentation, allows delaying entry into the associated Conditions and Required Actions for up to 6 hours when a channel is placed in an inoperable status solely for performance of required Surveillances provided the associated Function or the redundant Function maintains ECCS initiation capability. Note 2(b) in TS 3.3.5.1 applies to Function 1.c, Reactor Steam Dome Pressure – Low (Injection Permissive), for Core Spray and Function 2.c, Reactor Steam Dome Pressure – Low (Injection Permissive), for Low Pressure Coolant Injection in Modes 1, 2, and 3. Prior to adopting TSTF-542 (Ref. 1), the same note applied in Modes 4 and 5. Approval and implementation of TSTF-542 moved the Mode 4 and 5 requirements of TS 3.3.5.1 Function 1.c and Function 2.c to the new TS 3.3.5.3 as Functions 1.a and 2.a (Ref. 1 and 2). The note to allow delayed entry into the Conditions and Required Actions was not moved with the Functions by TSTF-542 and was therefore not included in TS 3.3.5.3.

During refueling outages, Fermi 2 performs transmitter calibrations associated with the Low Pressure Coolant Injection (LPCI) and Core Spray (CS) “Reactor Steam Dome Pressure – Low (Injection Permissive)” instrumentation during Modes 4 and 5 when a subsystem of LPCI or CS is required to be operable by TS 3.5.2. These surveillances historically take approximately one hour to complete. When performing the transmitter calibration without the 6 hour delay that was previously allowed by the TS 3.3.5.1 SR Note, Fermi 2 is required to enter into TS 3.3.5.3 Condition C to place the channel in a tripped condition within 1 hour even though the associated Function maintains ECCS initiation capability. Failure to put the channel in the tripped condition within 1 hour would require declaring the associated low pressure ECCS subsystem inoperable (TS 3.3.5.3, Condition D) even though the supporting instrumentation is still capable of performing its intended function.

Reinstating the SR Note will also minimize distractions to the main control room staff during performance of the SR by avoiding entry into additional TS Conditions and associated Actions.

2.4 Description of the Proposed Change

The proposed change is to provide a note prior to the Surveillance Requirements (SR) section of TS 3.3.5.3 that allows delayed entry into the associated Conditions and Required Actions when a channel is placed in an inoperable status solely for testing, provided the associated Function maintains ECCS initiation capability. The note will read as follows:

When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours for Functions 1.a and 2.a, provided the associated Function maintains ECCS initiation capability.

Enclosure 2 provides the existing TS pages marked to show the proposed changes. Enclosure 3 provides revised (clean) TS pages. The associated Bases mark-up pages are provided in Enclosure 4 for information only.

3.0 TECHNICAL EVALUATION

The proposed TS 3.3.5.3 SR Note allows required surveillance testing which causes a channel to be inoperable without entering into associated Conditions and taking Required Actions for an inoperable channel for up to 6 hours provided the associated Function maintains ECCS initiation capability. The proposed Note for TS 3.3.5.3 Functions 1.a and 2.a is consistent with Note 2(b) in TS SR 3.3.5.1. Approval and implementation of TSTF-542 created TS 3.3.5.3 by, in part, moving all Mode 4 and 5 requirements from TS 3.3.5.1 to the new TS 3.3.5.3 (Ref. 2). The proposed SR Note previously applied to these Functions when they resided in TS 3.3.5.1 prior to approval and implementation of TSTF-542. As described in the TS Bases for the existing Note in TS 3.3.5.1, the Note is based on the NEDC-30936-P-A (Ref. 4) reliability analysis assumption of the average time required to perform channel surveillance. The reliability analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the ECCS will initiate when necessary. Reinstating the SR Note for TS 3.3.5.3 Functions 1.a and 2.a in Modes 4 and 5 makes TS 3.3.5.3 consistent with the TS 3.3.5.1 SR Note for Modes 1, 2, and 3 for the same Functions (Functions 1.c and 2.c) and consistent with the Mode 4 and 5 requirements of the Functions prior to approval and implementation of TSTF-542.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36, requires Technical Specifications to include limiting safety system settings (LSSS) for variables that have significant safety functions. LSSS are defined by the regulation as “Where a LSSS is specified for a variable on which a safety limit has been placed, the setting must be chosen so that automatic protective actions will correct the abnormal situation before a Safety Limit (SL) is exceeded.”

The proposed change does not affect plant compliance with this regulation and will ensure safe operation by continuing to meet applicable regulations and requirements.

The regulations at 10 CFR Part 50, Appendix A, General Design Criteria (GDC) 13, “Instrumentation and control,” states that instrumentation shall be provided to monitor variables and systems over their anticipated ranges for normal operation, for anticipated operational occurrences, and for accident conditions as appropriate to assure adequate safety, including those variables and systems that can affect the fission process, the integrity of the reactor core, the

reactor coolant pressure boundary, and the containment and its associated systems. Appropriate controls shall be provided to maintain these variables and systems within prescribed operating ranges.

The regulations at 10 CFR Part 50, Appendix A, GDC 14, “Reactor coolant pressure boundary,” states that the reactor coolant pressure boundary shall be designed, fabricated, erected, and tested so as to have an extremely low probability of abnormal leakage, of rapidly propagating failure, and of gross rupture.

The regulations at 10 CFR Part 50, Appendix A, GDC 30, “Quality of reactor coolant pressure boundary,” states that systems be designed with a means for detecting and, to the extent practical, identifying the source of reactor coolant leakage.

The regulations at 10 CFR Part 50, Appendix A, GDC 33, “Reactor coolant makeup,” states that a system be designed to supply reactor coolant makeup for protection against small breaks in the reactor coolant pressure boundary.

The proposed change is consistent with these GDCs in that the design requirements for instrumentation, reactor coolant leak detection, the reactor coolant pressure boundary, and reactor coolant makeup are unaffected.

4.2 Precedent

The proposed Note is consistent with the existing Note for TS 3.3.5.1 Surveillance Requirements. TS 3.3.5.3 was created from moving the Mode 4 and 5 requirements from TS 3.3.5.1 when TSTF-542 was approved in License Amendment 211 (Ref. 2). The Note for TS 3.3.5.1 Surveillance Requirements was approved for use at Fermi during Modes 1 – 5 with License Amendment 134 (Ref. 3).

In addition, NUREG-1433, Standard Technical Specifications (STS) for General Electric BWR/4 Plants, Revision 4 contains the proposed SR Note (STS 3.3.5.1) for the Reactor Steam Dome Pressure – Low Injection Permissive Functions (STS Table 3.3.5.1-1 Function 1.c and 2.c) for Modes 1 – 5.

4.3 No Significant Hazards Consideration Analysis

In accordance with 10 CFR 50.90, “Application for amendment of license, construction permit or early site permit,” DTE is requesting to amend Renewed Facility Operating License No. NPF-43 for Fermi 2.

DTE proposes to revise TS Section 3.3.5.3 and associated Bases as described in Section 2.0 above.

DTE has evaluated whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92(c), "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The change to TS 3.3.5.3 adds a note that previously applied when the Surveillance Requirements for Modes 4 and 5 were included in TS 3.3.5.1. There are no new requirements or actions added that have not been previously approved. Applying the note cannot increase probability of an accident because it does not change plant equipment or SR method or surveillance frequency.

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

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change duplicates existing TS Surveillance Requirements that will continue to protect Safety Limit 2.1.1.3. The note requires ECCS initiation function to be maintained in order to allow the delayed entry into the Condition. The proposed change will not alter the design function of the equipment involved. The event of concern is an unexpected draining event. The proposed change does not create new failure mechanisms, malfunctions, or accident initiators that would cause a draining event or a new or different kind of accident not previously evaluated or included in the design and licensing bases.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes have no adverse effect on plant operation. The plant response to the design basis accidents do not change. The proposed changes do not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analyses. There is no change being made to safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed changes. The analysis in NEDC-30936-P-A demonstrates that the testing allowance does not significantly

reduce the probability that the ECCS will initiate when necessary. The note can only be used when initiation capability is maintained.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, DTE concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of “no significant hazards consideration” is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

DTE has evaluated the proposed amendment for environmental considerations. The review has resulted in the determination that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment is required for the proposed amendment.

6.0 REFERENCES

1. TSTF-542, Reactor Pressure Vessel Water Inventory Control, Dated 3/22/2016 (ML16074A448)
2. NPF 43 App A AMD 211, Operating License and Technical Specification (License Amendment 211), Dated 9/17/2018 (ML18247A452)
3. NPF 43 App A AMD 134, Fermi 2 Operating License and Technical Specification (License Amendment 134), Dated 9/30/1999
4. NEDC-30936-P-A, “BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2,” Dated December 1988.

**Enclosure 2 to
NRC-19-0001**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**License Amendment Request to Revise Technical Specification 3.3.5.3,
RPV Water Inventory Control Instrumentation**

Proposed Technical Specification Changes (Mark-Up)

Revised Pages

3.3-49b (3.3.5.3 RPV Water Inventory Control Instrumentation)

3.3-49c (3.3.5.3 RPV Water Inventory Control Instrumentation) For Information Only

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. As required by Required Action A.1 and referenced in Table 3.3.5.3-1. OR Required Action and associated Completion Time of Condition C not met.	D.1 Declare associated low pressure ECCS injection/spray subsystem inoperable.	Immediately

2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours for Functions 1.a and 2.a, provided the associated Function maintains ECCS initiation capability.

SURVEILLANCE REQUIREMENTS

1.

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

S

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
SR 3.3.5.3.3 Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

NO CHANGES. INCLUDED FOR REFERENCE

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 (Injection Permissive)	4,5	4(a)	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 441 psig
b. Manual Initiation	4,5	1 per subsystem (a), (c)	D	SR 3.3.5.3.3	NA
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure—Low (Injection Permissive)	4,5	4(a)	C	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 441 psig
b. Manual Initiation	4,5	1 per subsystem (a), (c)	D	SR 3.3.5.3.3	NA
3. RHR System Isolation					
a. Reactor Vessel Water Level—Low, Level 3	(b)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 171.9 inches
4. Reactor Water Cleanup (RWCU) System Isolation					
a. Reactor Vessel Water Level—Low Low, Level 2	(b)	2 in one trip system	B	SR 3.3.5.3.1 SR 3.3.5.3.2	≥ 103.8 inches

(a) Associated with an ECCS subsystem required to be OPERABLE by LCO 3.5.2, "Reactor Pressure Vessel Water Inventory Control."

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

(c) Individual component controls.

**Enclosure 3 to
NRC-19-0001**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**License Amendment Request to Revise Technical Specification 3.3.5.3,
RPV Water Inventory Control Instrumentation**

Revised Technical Specification Pages

Revised Pages
3.3-49b (3.3.5.3 RPV Water Inventory Control Instrumentation)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. As required by Required Action A.1 and referenced in Table 3.3.5.3-1. <u>OR</u> 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

- NOTES-----
1. Refer to Table 3.3.5.3-1 to determine which SRs apply for each ECCS Function.
 2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours for Functions 1.a and 2.a, provided the associated Function maintains ECCS initiation capability.
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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
SR 3.3.5.3.3 Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

**Enclosure 4 to
NRC-19-0001**

**Fermi 2 NRC Docket No. 50-341
Operating License No. NPF-43**

**License Amendment Request to Revise Technical Specification 3.3.5.3,
RPV Water Inventory Control Instrumentation**

Proposed TS Bases Changes (For Information Only)

Revised Pages

B 3.3.5.3-7 (B 3.3.5.3 RPV Water Inventory Control Instrumentation)

B 3.3.5.3-9 (B 3.3.5.3 RPV Water Inventory Control Instrumentation)

BASES

ACTIONS (continued)

operator can take manual control of the pump and the injection valve to inject water into the RPV.

The Completion Time of 1 hour is intended to allow the operator time to evaluate any discovered inoperabilities and to place the channel in trip.

D.1

If a manual initiation function is inoperable, the associated low pressure ECCS injection/spray subsystem may be incapable of performing the intended function, and must be declared inoperable immediately.

With the Required Action and associated Completion Time of Condition C not met, the associated low pressure ECCS injection/spray subsystem may be incapable of performing the intended function, and must be declared inoperable immediately.

SURVEILLANCE REQUIREMENTS

As noted in the beginning of the SRs, the SRs for each RPV Water Inventory Control instrument Function are found in the SRs column of Table 3.3.5.3-1.

SR 3.3.5.3.1

See Insert 1

Performance of the CHANNEL CHECK ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK guarantees that undetected outright channel failure is limited; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL FUNCTIONAL TEST.

Insert 1

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours for Functions 1.a and 2.a provided the associated Function maintains ECCS initiation capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 6) assumption of the average time required to perform channel surveillance. The analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the ECCS will initiate when necessary.

BASES

REFERENCES

1. Information Notice 84-81 "Inadvertent Reduction in Primary Coolant Inventory in Boiling Water Reactors During Shutdown and Startup," November 1984.
2. Information Notice 86-74, "Reduction of Reactor Coolant Inventory Because of Misalignment of RHR Valves," August 1986.
3. Generic Letter 92-04, "Resolution of the Issues Related to Reactor Vessel Water Level Instrumentation in BWRs Pursuant to 10 CFR 50.54(F)," August 1992.
4. NRC Bulletin 93-03, "Resolution of Issues Related to Reactor Vessel Water Level Instrumentation in BWRs," May 1993.
5. Information Notice 94-52, "Inadvertent Containment Spray and Reactor Vessel Draindown at Millstone 1," July 1994.

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6. NEDC-30936-P-A, "BWR Owners' Group Technical Specification Improvement Analyses for ECCS Actuation Instrumentation, Part 2," December 1988.