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3.3 INSTRUMENTATION

3.3.2.1 Control Rod Block Instrumentation

LCO 3.3.2.1 The control rod block instrumentation for each Function in Table 3.3.2.1-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2.1-1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more rod withdrawal limiter (RWL) channels inoperable.	A.1 Suspend control rod withdrawal.	Immediately
B. One or more rod pattern controller channels inoperable.	B.1 Suspend control rod movement except by scram.	Immediately
C. One or more Reactor Mode Switch—Shutdown Position channels inoperable.	C.1 Suspend control rod withdrawal.	Immediately
	<u>AND</u> C.2 Initiate action to fully insert all insertable control rods in core cells containing one or more fuel assemblies.	Immediately

SURVEILLANCE REQUIREMENTS

NOTES

1. Refer to Table 3.3.2.1-1 to determine which SRs apply for each Control Rod Block Function.
2. When a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours provided the associated Function maintains control rod block capability.

SURVEILLANCE	FREQUENCY
SR 3.3.2.1.1 -----NOTE----- Not required to be performed until 1 hour after THERMAL POWER is > 70% RTP; greater than the RWL high power setpoint (HPS). Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.2.1.2 -----NOTE----- Not required to be performed until 1 hour after THERMAL POWER is > 35% RTP and ≤ 70% RTP; less than or equal to the RWL HPS. Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.2.1.3 -----NOTE----- Not required to be performed until 1 hour after any control rod is withdrawn in MODE 2. Perform CHANNEL FUNCTIONAL TEST.	92 days

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.2.1.4	-----NOTE----- Not required to be performed until 1 hour after THERMAL POWER is \leq 20% RTP in MODE 1. ----- Perform CHANNEL FUNCTIONAL TEST.	92 days
SR 3.3.2.1.5	Calibrate the low power setpoint analog trip modules. The Allowable Value shall be $>$ 20% RTP and \leq 35% RTP.	92 days
SR 3.3.2.1.6	Verify the RWL high power Function is not bypassed when THERMAL POWER is $>$ 70% RTP.	92 days
SR 3.3.2.1.7	Perform CHANNEL CALIBRATION.	18 months
SR 3.3.2.1.8	-----NOTE----- Not required to be performed until 1 hour after reactor mode switch is in the shutdown position. ----- Perform CHANNEL FUNCTIONAL TEST.	18 months
SR 3.3.2.1.9	Verify the bypassing and movement of control rods required to be bypassed in Rod Action Control System (RACS) is in conformance with applicable analyses by a second licensed operator or other qualified member of the technical staff.	Prior to and during the movement of control rods bypassed in RACS

Control Rod Block Instrumentation
3.3.2.1Table 3.3.2.1-1 (page 1 of 1)
Control Rod Block Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
1. Rod Pattern Control System			
a. Rod withdrawal limiter	(a)	2	SR 3.3.2.1.1 SR 3.3.2.1.6 SR 3.3.2.1.9
	(b)	2	SR 3.3.2.1.2 SR 3.3.2.1.5 SR 3.3.2.1.7 SR 3.3.2.1.9
b. Rod pattern controller	1 ^(c) , 2	2	SR 3.3.2.1.3 SR 3.3.2.1.4 SR 3.3.2.1.5 SR 3.3.2.1.7 SR 3.3.2.1.9
2. Reactor Mode Switch - Shutdown Position	(d)	2	SR 3.3.2.1.8

(a) THERMAL POWER ~~> 70% RTP~~ greater than the RWL HPSP.(b) THERMAL POWER > 35% RTP and ~~≤ 70% RTP~~ less than or equal to the RWL HPSP.

(c) With THERMAL POWER ≤ 20% RTP.

(d) Reactor mode switch in the shutdown position.

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Bases

BASES

BACKGROUND
(continued)

The purpose of the RPC is to ensure control rod patterns during startup are such that only specified control rod sequences and relative positions are allowed over the operating range from all control rods inserted to 20% RTP. The sequences effectively limit the potential amount and rate of reactivity increase during a CRDA. The RPC, in conjunction with the RCIS, will initiate control rod withdrawal and insert blocks when the actual sequence deviates beyond allowances from the specified sequence. The rod block logic circuitry is the same as that described above. The RPC also uses the turbine first stage pressure to determine when reactor power is above the power at which the RPC is automatically bypassed (Ref. 1).

With the reactor mode switch in the shutdown position, a control rod withdrawal block is applied to all control rods to ensure that the shutdown condition is maintained. This function prevents criticality resulting from inadvertent control rod withdrawal during MODE 3 or 4, or during MODE 5 when the reactor mode switch is required to be in the shutdown position. The reactor mode switch has two channels, with each providing inputs into a separate rod block circuit. A rod block in either circuit will provide a control rod block to all control rods.

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY1.a. Rod Withdrawal Limiter

The RWL is designed to prevent violation of the MCPR SL and the cladding 1% plastic strain fuel design limit that may result from a single control rod withdrawal error (RWE) event. The analytical methods and assumptions used in evaluating the RWE event are summarized in Reference 2. A statistical analysis of RWE events was performed to determine the MCPR response as a function of withdrawal distance and initial operating conditions. From these responses, the fuel thermal performance was determined as a function of RWL allowable control rod withdrawal distance and power level.

The RWL satisfies Criterion 3 of the NRC Policy Statement. Two channels of the RWL are available and are required to be OPERABLE to ensure that no single instrument failure can preclude a rod block from this function. ↗

(continued)

The RWL high power function channels are considered OPERABLE when control rod withdrawal is limited to no more than two notches. The RWL low power function channels are considered OPERABLE when control rod withdrawal is limited to no more than four notches.

Control Rod Block Instrumentation
B 3.3.2.1

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BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY

1.a. Rod Withdrawal Limiter (continued)

Nominal trip set points are specified in the setpoint calculations. The nominal setpoints are selected to ensure that the setpoints do not exceed the Allowable Values between successive CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., reactor power), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., analog trip module) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The Allowable Values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drive, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for.

The RWL is assumed to mitigate the consequences of an RWE event when operating > 35% RTP. Below this power level, the consequences of an RWE event will not exceed the MCPR, and therefore the RWL is not required to be OPERABLE (Ref. 3).

1.b. Rod Pattern Controller

The RPC enforces the banked position withdrawal sequence (BPWS) to ensure that the initial conditions of the CRDA analysis are not violated. The analytical methods and assumptions used in evaluating the CRDA are summarized in References 4 and 5. The BPWS requires that control rods be moved in groups, with all control rods assigned to a specific group required to be within specified banked positions. Requirements that the control rod sequence is in compliance with BPWS are specified in LCO 3.1.6, "Control Rod Pattern."

(continued)

BASES

ACTIONS
(continued)C.1 and C.2

If one Reactor Mode Switch—Shutdown Position control rod withdrawal block channel is inoperable, the remaining OPERABLE channel is adequate to perform the control rod withdrawal block function. Required Action C.1 and Required Action C.2 are consistent with the normal action of an OPERABLE Reactor Mode Switch—Shutdown Position Function to maintain all control rods inserted. Therefore, there is no distinction between Required Actions for the Conditions of one or two channels inoperable. In both cases (one or both channels inoperable), suspending all control rod withdrawal immediately, and immediately initiating action to fully insert all insertable control rods in core cells containing one or more fuel assemblies will ensure that the core is subcritical, with adequate SDM ensured by LCO 3.1.1, "SHUTDOWN MARGIN (SDM)." Control rods in core cells containing no fuel assemblies do not affect the reactivity of the core and are therefore not required to be inserted. Action must continue until all insertable control rods in core cells containing one or more fuel assemblies are fully inserted.

SURVEILLANCE
REQUIREMENTS

As noted at the beginning of the SR, the SRs for each Control Rod Block instrumentation Function are found in the SRs column of Table 3.3.2.1-1.

The Surveillances are also 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, provided the associated Function maintains control rod block 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.

SR 3.3.2.1.1, SR 3.3.2.1.2, SR 3.3.2.1.3, and
SR 3.3.2.1.4

The CHANNEL FUNCTIONAL TESTS for the RPC and RWL are performed by attempting to withdraw a control rod not in compliance with the prescribed sequence and verifying that a control rod block occurs. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology. As noted, the SRs are not

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SR 3.3.2.1.1
verifies proper
operation of the
two-notch withdrawal
limit of the RWL and
SR 3.3.2.1.2 verifies
proper operation of
the four-notch
withdrawal limit
of the RWL. SR
3.3.2.1.3 and SR
3.3.2.1.4 verify
proper operation
of the RPC.

Control Rod Block Instrumentation
B 3.3.2.1

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.2.1.1, SR 3.3.2.1.2, SR 3.3.2.1.3, and
SR 3.3.2.1.4 (continued)

required to be performed until 1 hour after specified conditions are met (e.g., after any control rod is withdrawn in MODE 2). This allows entry into the appropriate conditions needed to perform the required SRs. The Frequencies are based on reliability analysis (Ref. 6).

SR 3.3.2.1.5

The LPSP is the point at which the RPCS makes the transition between the function of the RPC and the RWL. This transition point is automatically varied as a function of power. This power level is inferred from the first stage turbine pressure (one channel to each trip system). These power setpoints must be verified periodically to be within the Allowable Values. If any LPSP is nonconservative, then the affected Functions are considered inoperable. Since this channel has both upper and lower required limits, it is not allowed to be placed in a condition to enable either the RPC or RWL Function. Because main turbine bypass steam flow can affect the LPSP nonconservatively for the RWL, the RWL is considered inoperable with any main turbine bypass valves open. The Frequency of 92 days is based on the setpoint methodology utilized for these channels.

SR 3.3.2.1.6

> 70% RTP.

HPSP

This SR ensures the high power function of the RWL is not bypassed when power is above the HPSP. The power level is inferred from turbine first stage pressure signals.

Periodic testing of the HPSP channels is required to verify the setpoint to be less than or equal to the limit.

Adequate margins in accordance with setpoint methodologies are included. If the HPSP is nonconservative, then the RWL is considered inoperable. Alternatively, the HPSP can be placed in the conservative condition (nonbypass). If placed in the nonbypassed condition, the SR is met and the RWL would not be considered inoperable. Because main turbine bypass steam flow can affect the HPSP nonconservatively for the RWL, the RWL is considered inoperable with any main turbine bypass valve open. The Frequency of 92 days is based on the setpoint methodology utilized for these channels.

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BASES

SURVEILLANCE
REQUIREMENTSSR 3.3.2.1.9 (continued)

adjustment of control rod speed. To ensure the proper bypassing and movement of those affected control rods, a second licensed operator or other qualified member of the technical staff must verify the bypassing and movement of these control rods is in conformance with applicable analyses. Compliance with this SR allows the RPC and RWL to be OPERABLE with these control rods bypassed.

REFERENCES

1. USAR, Section 7.6.1.7.
2. USAR, Section 15.4.2.
3. NEDE-24011-P-A, "General Electric Standard Application for Reload Fuel" (latest approved revision).
4. NEDO-21231, "Banked Position Withdrawal Sequence," January 1977.
5. NRC SER, Acceptance of Referencing of Licensing Topical Report NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel, Revision 8, Amendment 17," December 27, 1987.
6. NEDC-30851-P-A, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation," October 1988.