ATTACHMENT 3

PROPOSED RELOCATION
OF SELECTED
TECHNICAL SPECIFICATIONS
AND ASSOCIATED BASES
TO THE
TECHNICAL REQUIREMENTS MANUAL (TRM)

INSTRUMENTATION

CHEMICAL DETECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.3.3.7 Three independent Chemical Detection Systems of each Unit shall be Unit shall be OPERABLE with their Alarm/Trip Setpoints adjusted to actuate at the following concentrations:

a.	Vinyl Acetate	≤ 10 ppm
b.	Anhydrous Ammonia/ Ammonium hydroxide/	≤ 25 ppm

APPLICABILITY: All MODES.*

ACTION:

a. With one Chemical Detection System inoperable, restore the inoperable system to OPERABLE status within 7 days or place the affected channel in its tripped condition.**

b. With two or more Chemical Detection Systems inoperable, within 1 hour initiate and maintain operation of the Control Room Emergency Ventilation System in the recirculation mode of operation.

SURVEILLANCE REQUIREMENTS

4.3.3.7 Each Chemical Detection System shall de demonstrated OPERABLE by performance of a CHANNEL CHECK at least one per 12 hours, an ANALOG and/or DIGITAL CHANNEL OPERATIONAL TEST at least once per 31 days and CHANNEL CALIBRATION at least once per 18 months.

* In MODES 5 and 6, if it becomes necessary to place the Control Room Emergency Ventilation System in the recirculation mode of operation and if other Technical Specifications (3.7.7 "Control Room Makeup and Cleanup Filtration System" and/or Table 3.3-3, Item 10 "Control Room Ventilation") require placing the system in the recirculation and makeup filtration mode, then in this situation, place the system in the filtered recirculation mode only.

**The inoperable system may be bypassed for up to 4 hours for surveillance testing of the other systems per Specification 4.3.3.7.

INSTRUMENTATION

3.3.3.7 (This specification number is not used.)

ELECTRICAL POWER SYSTEMS

3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

LIMITING CONDITION FOR OPERATION

3.8.4.1 For each containment penetration provided with a penetration conductor overcurrent protective device(s), each device shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

With one or more of the containment penetration conductor overcurrent protective device(s) inoperable:

a. Restore the protective device(s) to OPERABLE status or deenergize the circuit(s) by tripping the associated backup circuit breaker or racking out or removing the inoperable circuit breaker within 72 hours, declare the affected system or component inoperable, and verify the backup circuit breaker to be tripped or the inoperable circuit breaker racked out or removed at least once per 7 days thereafter; or

b. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.8.4.1 Protective devices required to be OPERABLE as containment penetration conductor overcurrent protective devices shall be demonstrated OPERABLE:

a. At least once per 18 months:

1) By verifying that the medium voltage 13.8 kV circuit breakers are OPERABLE by selecting, on a rotating basis, at least 10% of the circuit breakers, and performing the following:

a) A CHANNEL CALIBRATION of the associated protective relays,

b) An integrated system functional test which includes simulated automatic actuation of the system and verifying that each relay and associated circuit breakers and control circuits function as designed, and

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c) For each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all the circuit breakers of the inoperable type shall also be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested.

2) By selecting and functionally testing a representative sample of at least 10% of each type of lower voltage circuit breakers. Circuit breakers selected for functional testing shall be selected on a rotating basis. Testing of these circuit breakers shall consist of injecting a current with a value equal to 300% of the pickup of the long-time delay trip element and 150% of the pickup of the short-time delay trip element, and verifying that the circuit breaker operates within the time delay band width for that current specified by the manufacturer. The instantaneous element shall be tested by injecting a current equal to ±20% of the pickup value of the element and verifying that the circuit breaker trips instantaneously with no intentional time delay. Molded case circuit breaker testing shall also follow this procedure except that generally no more than two trip elements, time delay and instantaneous, will be involved. The instantaneous element for molded case circuit breakers shall be tested by injecting a current for a frame size of 250 amps or less with tolerances of +40%, -25% and a frame size of 400 amps or greater of ±25% and verifying that the circuit breaker trips instantaneously with no apparent time delay. Circuit breakers found inoperable during functional testing shall be restored to OPERABLE status prior to resuming operation. For each circuit breaker found inoperable during these functional tests, an additional representative sample of at least 10% of all the circuit breakers of the inoperable type shall also be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested; and

b. At least once per 60 months by subjecting each circuit breaker to an inspection and preventive maintenance in accordance with procedures prepared in conjunction with its manufacturer's recommendations.

ELECTRICAL POWER SYSTEMS

3.3.8.4 (This specification number is not used.)

ELECTRICAL POWER SYSTEMS

3.3.8.4 (This specification number is not used.)

REMOTE SHUTDOWN SYSTEM (Continued)

The OPERABILITY of the Remote Shutdown System ensures that a fire will not preclude achieving safe shutdown. The Remote Shutdown System instrumentation, control, and power circuits and transfer switches necessary to eliminate effects of the fire and allow operation of instrumentation, control and power circuits required to achieve and maintain a safe shutdown condition are independent of areas where a fire could damage systems normally used to shut down the reactor. This capability is consistent with General Design Criterion 3 and Appendix R to 10 CFR Part 50.

3/4.3.3.6 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, Revision 2, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1980 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980. The instrumentation listed in Table 3.3-10 corresponds to the Category 1 instrumentation for which selection, design, qualification and display criteria are described in Regulatory Guide 1.97, Revision 2.

3/4.3.3.7 ~~(Not Used)CHEMICAL DETECTION SYSTEMS~~

~~The OPERABILITY of the Chemical Detection Systems ensures that sufficient capability is available to promptly detect and initiate protective action in the event of an accidental chemical release. This capability is required to protect control room personnel and is consistent with the recommendations of Regulatory Guide 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated Hazardous Chemical Release," June 1974.~~

~~Provision in the Action Statement is included for conditions whereby the inoperability of the Chemical Detection System precludes the use of makeup as required for Action Statement a. for MODES 5 and 6 of Technical Specification 3.7.7 or Table 3.3-3, Item 10, ACTION 27, 28.~~

~~The automatic actuation of the Control Room HVAC makeup mode while in the Action Statement for the Chemical Detection System does not constitute a violation of Technical Specification 3.3.3.7 ACTION a. or b. because this actuation protects the operators from a radiological event.~~

3/4.3.3.8 (Not Used)

ELECTRICAL POWER SYSTEMS

BASES

3/4.8.4 (Not Used)~~ELECTRICAL EQUIPMENT PROTECTIVE DEVICES~~

~~Containment electrical penetrations and penetration conductors are protected by either deenergizing circuits not required during reactor operation or by demonstrating the OPERABILITY of primary and backup overcurrent protection circuit breakers during periodic surveillance.~~

~~The Surveillance Requirements applicable to lower voltage circuits breakers provide assurance of breaker reliability by testing a representative sample of at least 10% of each manufacturer's brand of circuit breaker. Each manufacturer's molded case and metal case circuit breakers are grouped into representative samples which are then tested on a rotating basis to ensure that all breakers are tested. If a wide variety exists within any manufacturer's brand of circuit breakers it is necessary to divide that manufacturer's breakers into groups and treat each group as a separate type of breaker for surveillance purposes.~~

~~The molded case circuit breakers will be tested in accordance with NEMA Standard Publication No. AB-2-1980. For a frame size of 250 amperes or less, the field tolerance of the high and low setting of the injected current will be within + 40%, -25% of the setpoint (pickup) value. For a frame size of 400 amperes or greater, the field tolerance will be ± 25% of the setpoint (pickup) value. The circuit breakers should not be affected when tested within their tolerance.~~

ATTACHMENT 4

TECHNICAL SPECIFICATION SCREENING
EVALUATION BASED ON THE
FINAL POLICY STATEMENT CRITERIA

Technical Specification Screening Form

(1) TECHNICAL SPECIFICATION Chemical Detection Systems

STP T.S. LOCATION/NUMBER 3.3.3.7

(2) EVALUATION BASED ON FINAL POLICY STATEMENT CRITERIA

Is the technical Specification applicable to:

YES	NO		
___	X	(1)	Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
___	X	(2)	A process variable, design feature, or operating restriction that is an initial condition of a Design Bases Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
___	X	(3)	A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Bases Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
___	X	(4)	A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to the public health and safety.

If the answer to any one of the above questions is "YES" then the Specifications shall be included in the Technical Specifications.

If the answer to all four Criteria is "NO" then the Specifications may be relocated to licensee-controlled documents.

Technical Specification Screening Form

(3) DISCUSSION

The Chemical Detection System Instrumentation is used to detect an accidental toxic gas release and isolate the control room atmosphere. An accidental toxic gas release is not a Design Basis Accident or transient.

The Chemical Detection System Instrumentation is not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Chemical Detection System Instrumentation does not meet Criterion 1.

The Chemical Detection System Instrumentation is not a process variable, design feature, or operating restriction that is an initial condition of a Design Bases Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Chemical Detection System Instrumentation does not meet Criterion 2.

The Chemical Detection System Instrumentation is not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Bases Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Chemical Detection System Instrumentation does not meet Criterion 3.

The Chemical Detection System Instrumentation is not a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to the public health and safety. The Chemical Detection System Instrumentation does not meet Criterion 4.

(4) CONCLUSION

____ *This Specification should be included in Technical Specifications.*

_x_ *This Specification may be relocated to a License-controlled Document.*

Technical Specification Screening Form

(1) TECHNICAL SPECIFICATION Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices

STP T.S. LOCATION/NUMBER 3.8.4.1

(2) EVALUATION BASED ON FINAL POLICY STATEMENT CRITERIA

Is the technical Specification applicable to:

YES	NO		
___	X	(1)	Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
___	X	(2)	A process variable, design feature, or operating restriction that is an initial condition of a Design Bases Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
___	X	(3)	A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Bases Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
___	X	(4)	A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to the public health and safety.

If the answer to any one of the above questions is "YES" then the Specifications shall be included in the Technical Specifications.

If the answer to all four Criteria is "NO" then the Specifications may be relocated to licensee-controlled documents.

Technical Specification Screening Form

(3) DISCUSSION

The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices are installed to minimize the potential for a fault in a component inside containment. This prevents an electrical penetration from being damaged in such a way that the containment structure is breached.

The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices are not installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices do not meet Criterion 1.

The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices do help preserve the assumptions of the safety analysis by enhancing proper equipment operation, however they are not a process variable, design feature, or operating restriction that is an initial condition of a Design Bases Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices do not meet Criterion 2.

The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices provide equipment and distribution system protection from faults or improper operation of other protective devices in addition to that provided by the design of the distribution system. However, the Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Bases Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices do not meet Criterion 3.

The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices are not a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to the public health and safety. The Electrical Equipment Protective Devices-Containment Penetration Conductor Overcurrent Protective Devices do not meet Criterion 4.

(4) CONCLUSION

____ *This Specification should be included in Technical Specifications.*

_X_ *This Specification may be relocated to a License-controlled Document.*