

TABLE 3.7.4-2 (Continued)  
SAFETY RELATED MECHANICAL SNUBBERS\*

SNUBBER NO.	AREA	ELEVATION	SNUBBER NO.	AREA	ELEVATION
<u>RCIC SYSTEM (Continued)</u>			<u>RWCU SYSTEM (Continued)</u>		
Q1E51G004R07	8	97	Q1G33G002R10	11	102
Q1E51G004R07	8	97	Q1G33G002R10	11	102
Q1E51G004R08	11	164	Q1G33G002R11	11	102
Q1E51G004R08	11	164	Q1G33G002R12	11	102
Q1E51G004R11	8	97	Q1G33G002R13	11	102
Q1E51G004R13	11	167	Q1G33G002R13	11	102
Q1E51G004R13	11	167	Q1G33G002R14	11	102
Q1E51G004R14	11	152	Q1G33G002R14	11	102
Q1E51G004R14	11	152	Q1G33G002R16	11	112
Q1E51G158R03	11	143	Q1G33G002R17	8	125
Q1E51G158R03	11	143	Q1G33G002R17	8	125
Q1E51G180R01	8	97	Q1G33G002R18	8	116
k. <u>COMBUSTIBLE GAS CONTROL SYSTEM</u>			Q1G33G002R19	8	116
Q1E61G001R07	11	189	Q1G33G002R21	11	102
			Q1G33G002R21	11	102
l. <u>RWCU SYSTEM</u>			Q1G33G002R22	11	102
Q1G33G002C03	11	113	Q1G33G002R24	11	
Q1G33G002C03	11	113	Q1G33G011R01	11	140
Q1G33G002R03	8	136	Q1G33G011R03	11	145
Q1G33G002R03	8	136	Q1G33G011R03	11	145
Q1G33G002R05	11	140	Q1G33G012R01	11	142
Q1G33G002R05	11	140	Q1G33G012R01	11	142
Q1G33G002R08	11	102	Q1G33G012R02	11	152
Q1G33G002R08	11	102	Q1G33G105R01	11	103
Q1G33G002R09	11	102	Q1G33G105R01	11	103
Q1G33G002R09	11	102	Q1G33G105R01	11	103

2. (MP&L P/L Item No. 198)

SUBJECT: Technical Specification Table 3.3.7.1-1, pages 3/4 3-56 and 3/4 3-58.

DESCRIPTION OF CHANGE: These changes are proposed in order to revise the minimum number of operable channels required for items 7, 8, and 9 of the Table 3.3.7.1-1 and to revise their associated action statements. The affected items are:

1. Containment and Drywell Ventilation Exhaust Radiation Monitor (Item 7)
2. Fuel Handling Area Ventilation Exhaust Radiation Monitor (Item 8)
3. Fuel Handling Area Pool Sweep Exhaust Radiation Monitor (Item 9)

Currently, a minimum of three channels are required to be operable for these items. This should be revised to "2/trip system" for each item. The action statements for these items (Actions 74 and 75) should also be revised so that they reflect the trip system logic of these items.

In addition, note "h" will be added to item 6 of Table 3.3.7.1-1, Control Room Ventilation Radiation Monitor, since it is also applicable to this item.

JUSTIFICATION: These revisions are required in order to reflect the design of the affected radiation monitoring systems. The logic is the same for each of the above items and is arranged as follows:

Each item consists of four monitors, with each monitor comprising one channel. The channels are grouped in pairs within two separate trip systems. Both channels in a trip system are required to trip to place the trip system in a tripped condition. With either of the two trip systems in a tripped condition, the associated trip function will be initiated.

The current requirement of three minimum operable channels does not apply to the instrumentation design and its associated two-out-of-two logic. By only requiring three monitors operable, it would be possible to have one trip system inoperable without entering the "b" section of the applicable action statement. This would be inconsistent with the single-failure criteria, as it applies to the design of these monitoring systems. To make the specification consistent with the design configuration, a minimum of two operable channels per trip system is required. Revision of the applicable action statements is required for clarification and to prevent entry into the "b" section in the event that two channels in different trip systems are inoperable. This would be overly

restrictive, since two operable channels in different trip systems would still be available to provide monitoring and initiation of the trip function, if required.

The addition of note "h" to item 6 is an enhancement, since it is also applicable to this item.

#### SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes render the technical specification for the affected instrumentation systems consistent with the design configuration of the systems. They ensure that adequate monitoring exists and that the plant is placed in a safe, conservative condition if such monitoring does not exist. The proposed changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.

TABLE 3.3.7.1-1  
RADIATION MONITORING INSTRUMENTATION

INSTRUMENTATION	MINIMUM CHANNELS OPERABLE	APPLICABLE CONDITIONS	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1. Component Cooling Water Radiation Monitor	1	At all times	$\leq 1 \times 10^5$ cpm/NA	10 to $10^6$ cpm	70
2. Standby Service Water System Radiation Monitor	1/heat exchanger train	1, 2, 3, and*	$\leq 1 \times 10^5$ cpm/NA	10 to $10^6$ cpm	70
3. Offgas Pre-treatment Radiation Monitor	1	1, 2	$\leq 5 \times 10^3$ mR/hr/NA	1 to $10^6$ mR/hr	70
4. Offgas Post-treatment Radiation Monitor	2 <sup>(d)</sup>	1, 2	$\leq 1 \times 10^5$ cpm (Hi), $\leq 1.0 \times 10^6$ cpm (Hi Hi Hi)	10 to $10^6$ cpm	71
5. Carbon Bed Vault Radiation Monitor	1	1, 2	$< 2 \times$ full power background/NA	1 to $10^6$ mR/hr	72
6. Control Room Ventilation Radiation Monitor	2 <sup>(h)</sup> /trip system	1,2,3,5 and**	$\leq 4$ mR/hr/ $\leq 5$ mR/hr <sup>#</sup>	$10^{-2}$ to $10^2$ mR/hr	73
7. Containment and Drywell Ventilation Exhaust Radiation Monitor	3 <sup>(h)</sup> 2/TRIP SYSTEM	At all times	$\leq 2.0$ mR/hr/ $\leq 4$ mR/hr <sup>(b)#</sup>	$10^{-2}$ to $10^2$ mR/hr	74
8. Fuel Handling Area Ventilation Exhaust Radiation Monitor	3 <sup>(h)</sup> 2/TRIP SYSTEM	1,2,3,5 and**	$\leq 2$ mR/hr/ $\leq 4$ mR/hr <sup>(d)#</sup>	$10^{-2}$ to $10^2$ mR/hr	75
9. Fuel Handling Area Pool Sweep Exhaust Radiation Monitor	3 <sup>(h)</sup> 2/TRIP SYSTEM	(c)	$\leq 18$ mR/hr/ $\leq 35$ mR/hr <sup>(d)#</sup>	$10^{-2}$ to $10^2$ mR/hr	75

## INSTRUMENTATION

TABLE 3.3.7.1-1 (Continued)

### RADIATION MONITORING INSTRUMENTATION

#### ACTION

- ACTION 70 - With the required monitor inoperable, obtain and analyze at least one grab sample of the monitored parameter at least once per 24 hours.
- ACTION 71 -
- a. With one of the required monitors inoperable, place the inoperable channel in the downscale tripped condition within one hour.
  - b. With both of the required monitors inoperable, be in at least HOT SHUTDOWN within 12 hours.
- ACTION 72- With the required monitor inoperable, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.
- ACTION 73 -
- a. With one of the required monitors in a trip system inoperable, place the inoperable channel in the downscale tripped condition within one hour; restore the inoperable channel to OPERABLE status within 7 days, or, within the next 6 hours; initiate and maintain operation of at least one control room emergency filtration system in the isolation mode of operation.
  - b. With both of the required monitors in a trip system inoperable, initiate and maintain operation of at least one control room emergency filtration system in the isolation mode of operation within one hour.
- ACTION 74 -
- a. 

IN A TRIP SYSTEM

With one of the required monitors inoperable, place the inoperable channel in the downscale tripped condition within one hour.
  - b. 

IN A TRIP SYSTEM

With two of the required monitors inoperable, isolate the containment and drywell purge and vent penetrations within 12 hours.
- ACTION 75 -
- a. 

IN A TRIP SYSTEM

With one of the required monitors inoperable, place the inoperable channel in the downscale tripped condition within one hour.
  - b. 

IN A TRIP SYSTEM

With two of the required monitors inoperable, initiate and maintain operation of at least one standby gas treatment subsystem within 12 hours.



3. (MP&L P/L Items No. 054 and 239)

SUBJECT: Plant Systems Actuation Instrumentation Technical Specification 3.3.8 and Table 3.3.8-1.

DESCRIPTION OF CHANGE: Certain revisions to Technical Specification 3.3.8 and Table 3.3.8-1 are proposed to make the Action Statements and minimum operable channel requirements for the containment spray system actuation instrumentation reflect system design requirements. Other revisions to these specifications are proposed to reformat the information to enhance readability.

1. Technical Specification Action Statement 3.3.8.a is revised to require that, with nonconservative setpoints, the channel is declared inoperable and action is taken as required by Table 3.3.8-1. (Page 3/4 3-96).
2. Technical Specification Action Statement 3.3.8.b is revised to require that with inoperable channels, the action required by Table 3.3.8-1 is taken. (Page 3/4 3-96).
3. Technical Specification Action statement 3.3.8.c is revised to transfer its requirements to Table 3.3.8-1. (Page 3/4 3-96).
4. Table 3.3.8-1 is revised to require two operable drywell pressure-high and reactor vessel water level-low low low level 1 channels for each containment spray trip system. Table 3.3.8-1 is also revised to reference the Action Statement number corresponding to each of the actuation instruments. (Page 3/4 3-98).
5. A continuation page for Table 3.3.8-1 is added that contains the applicable Action Statements. (New page 3/4 3-98a).

JUSTIFICATION: In the Grand Gulf design, there are two containment spray systems (A & B), each with one trip system. Each trip system consists of the following channels:

1. Two drywell pressure-high,
2. Two containment pressure-high,
3. Two reactor vessel water level-low low low, level 1, and
4. One 10 minute timer (Note: System B has an additional timer to provide a delay of up to 90 seconds).

Upon receipt of a Loss of Coolant Accident (LOCA) signal, containment spray actuation instrumentation starts a timer. If at the end of the timer cycle (10 minutes) a containment high pressure signal exists, the Low Pressure Coolant Injection (LPCI-A) flow will be diverted from the reactor to the containment spray function. Ninety seconds later, LPCI-B flow will divert providing the initiating conditions for containment spray are present.

One of the changes to Table 3.3.8-1 involves increasing the minimum number of operable channels per trip system from one to two for the drywell pressure-high and reactor vessel water level-low low low, level 1 instruments. These instruments provide LOCA ECCS initiation signals and isolation actuation signals as listed in Tables 3.3.3-1 and 3.3.2-1, respectively, as well as an initiation signal for the containment spray timers. To be consistent with Tables 3.3.3-1 and 3.3.2-1 and to reflect LOCA initiation logic requirements, the minimum operable channels requirement for both instruments is increased from one to two. The present containment pressure-high minimum operable channels requirement should not be changed as only one channel per trip system is required to ensure that a single failure will not disable both containment spray systems.

The changes proposed to the Action Statements in Technical Specification 3.3.8 are made to reflect system design requirements and promote readability. Action Statements a and b.1 do not adequately address the containment spray timers. If inoperable, the timers should not be placed in a tripped condition since this could lead to LPCI flow diversion to the containment spray header prior to the analyzed 10 minutes. The proper action for an inoperable timer is to declare the associated trip system inoperable; this is reflected in Action 131, which is proposed for addition to Table 3.3.8-1. Action Statement b.2 indicates there are two, rather than one, trip systems for each containment spray system. Action Statement b.2 has been corrected and appears as Action 130 b on Table 3.3.8-1.

For readability all action requirements of Specification 3.3.8 concerning specific inoperable channels have been moved to Table 3.3.8-1. Proposed Actions a and b now reference Table 3.3.8-1 for the action requirements for inoperable channels. Action Statement c of Technical Specification 3.3.8 has been moved to Table 3.3.8-1 as Action 132. The reformating of action requirements into Table 3.3.8-1 is purely administrative.

#### SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes to the Technical Specifications have been evaluated to involve no significant hazard as defined in 10 CFR 50.92.

The increase in the minimum operable channels for drywell pressure-high and reactor vessel water level, low, low, low level 1 promotes consistency throughout the Technical Specifications.

The changes to the Action Statements are made to reflect system design, to promote readability, and to ensure that the containment spray timers are not placed in a condition that would cause early LPCI diversion.

All changes proposed here are either purely administrative in nature and constitute no safety impact or represent more conservative operational requirements.

The proposed changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.



## INSTRUMENTATION

### 3/4.3.8 PLANT SYSTEMS ACTUATION INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

3.3.8 The plant systems actuation instrumentation channels shown in Table 3.3.8-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.8-2.

APPLICABILITY: As shown in Table 3.3.8-1.

ACTION:

— take the ACTION required by Table 3.3.8-1.

- a. With a plant system actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.8-2, declare the channel inoperable and ~~then place the inoperable channel in the tripped condition until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value, or declare the associated system inoperable.~~

b. ~~For the containment spray system:~~

1. ~~With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system, place at least one inoperable channel in the tripped condition within one hour or declare the associated system inoperable.~~
2. ~~With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, declare the associated system inoperable.~~

c. ~~For the feedwater system/main turbine trip system:~~

1. ~~With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels requirement, restore the inoperable channel to OPERABLE status within 7 days or be in at least STARTUP within the next 6 hours.~~
2. ~~With the number of OPERABLE channels two less than required by the Minimum OPERABLE Channels per Trip System requirement, restore at least one of the inoperable channels to OPERABLE status within 72 hours or be in at least STARTUP within the next 6 hours.~~

— With one or more plant systems actuation instrument channels inoperable, take the ACTION required by Table 3.3.8-1.

TABLE 3.3.8-1  
PLANT SYSTEMS ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
1. <u>CONTAINMENT SPRAY SYSTEM</u>			
a. Drywell Pressure-High	<del>1</del> 2	1, 2, 3	130
b. Containment Pressure-High	1	1, 2, 3	131
c. Reactor Vessel Water Level-Low Low Low, Level 1	<del>1</del> 2	1, 2, 3	130
d. Timers			
1) System A	1	1, 2, 3	131
2) System B	1	1, 2, 3	131
2. <u>FEEDWATER SYSTEM/MAIN TURBINE TRIP SYSTEM</u>			
a. Reactor Vessel Water Level-High, Level 8	3	1	132

TABLE 3.3.8-1 (Continued)

PLANT SYSTEMS ACTUATION INSTRUMENTATION

ACTION

- ACTION 130 -    a.    With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels per Trip System requirement, place the inoperable channel in the tripped condition within one hour; otherwise, declare the associated containment spray system inoperable and refer to Technical Specification 3.6.3.2.
- b.    With the number of OPERABLE channels two less than required by the Minimum OPERABLE Channels per Trip system requirement, declare the associated containment spray system inoperable and refer to Technical Specification 3.6.3.2.
- ACTION 131 -    With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip system requirement, restore the channels to OPERABLE status within one hour; otherwise, declare the associated containment spr, system inoperable and refer to Technical Specification 3.6.3.2.
- ACTION 132 -    For the feedwater system/main turbine trip system:
- a.    With the number of OPERABLE channels one less than required by the Minimum OPERABLE Channels requirement, restore the inoperable channel to OPERABLE status within 7 days or be in at least STARTUP within the next 6 hours.
- b.    With the number of OPERABLE channels two less than required by the Minimum OPERABLE Channels per Trip System requirement, restore at least one of the inoperable channels to OPERABLE status with 72 hours or be in at least STARTUP within the next 6 hours.

4. (MP&L P/L Item No. 213)

SUBJECT: Automatic Depressurization System (ADS) Trip System Minimum Operable Channel Requirements, Technical Specification Table 3.3.3-1 of Technical Specification 3.3.3.

DESCRIPTION OF CHANGE: Revisions to Technical Specification Table 3.3.3-1 are proposed to achieve consistency between the Technical Specifications and the ADS trip system design.

1. Items A.2.g and B.2.f of Table 3.3.3-1 should be revised to require two operable manual initiation hand switches per system, instead of one per valve. (Page 3/4 3-25.)
2. Action Statement 32 should be revised to change the reference to an individual ADS valve to read "ADS trip system". (Page 3/4 3-27.)

JUSTIFICATION: The Grand Gulf ADS consists of eight safety/relief valves and associated actuation instrumentation. The actuation instrumentation consists of two trip systems, either of which will actuate all eight ADS valves. Each ADS trip system includes two manual handswitches, and actuation signals from both hand switches are required to produce an ADS trip system actuation signal.

Presently, the manual initiation channels for ADS on Table 3.3.3-1 requires "1/valve" as the minimum operable channels per trip function. The "1/valve" requirement refers to hand switches used to actuate individual safety/relief valves, not to the two handswitches per trip system used to actuate the ADS trip system. Items A.2.g and B.2.f on Table 3.3.3-1 should be revised to reflect system level manual ADS initiation instead of the present individual valve manual initiation function.

Action Statement 32 on Table 3.3.3-1 for the ADS manual initiation function is no longer applicable upon implementation of the proposed changes to the minimum operable channels. In the context of the above proposed changes, the reference to an individual ADS valve is now inappropriate and should be changed to read "ADS trip system."

SIGNIFICANT HAZARDS CONSIDERATION:

The proposed changes to the Technical Specifications have been evaluated to involve no significant hazard, as defined in 10 CFR 50.92.

The proposed changes render the information presented in Table 3.3.3-1 and Action Statement 32 concerning ADS manual initiation consistent with the ADS as-built design. The proposed changes are not considered to:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant hazards consideration.



TABLE 3.3.3-1

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION<sup>(a)</sup></u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
<b>A. DIVISION 1 TRIP SYSTEM</b>			
<b>1. RHR-A (LPCI MODE) &amp; LPCS SYSTEM</b>			
a. Reactor Vessel Water Level - Low Low Low, Level 1	2 <sup>(b)</sup>	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2 <sup>(b)</sup>	1, 2, 3	30
c. LPCI Pump A Start Time Delay Relay	1	1, 2, 3, 4*, 5*	31
d. Manual Initiation	1/system	1, 2, 3, 4*, 5*	32
<b>2. AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "A"<sup>#</sup></b>			
a. Reactor Vessel Water Level - Low Low Low, Level 1	2 <sup>(b)</sup>	1, 2, 3	30
b. Drywell Pressure - High	2 <sup>(b)</sup>	1, 2, 3	30
c. ADS Timer	1	1, 2, 3	31
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1	1, 2, 3	31
e. LPCS Pump Discharge Pressure-High (Permissive)	2	1, 2, 3	31
f. LPCI Pump A Discharge Pressure-High (Permissive)	2	1, 2, 3	31
g. Manual Initiation	<del>1/valve</del> 2/SYSTEM	1, 2, 3	32
<b>B. DIVISION 2 TRIP SYSTEM</b>			
<b>1. RHR B &amp; C (LPCI MODE)</b>			
a. Reactor Vessel Water Level - Low, Low Low, Level 1	2 <sup>(b)</sup>	1, 2, 3, 4*, 5*	30
b. Drywell Pressure - High	2 <sup>(b)</sup>	1, 2, 3	30
c. LPCI Pump B Start Time Delay Relay	1	1, 2, 3, 4*, 5*	31
d. Manual Initiation	1/system	1, 2, 3, 4*, 5*	32
<b>2. AUTOMATIC DEPRESSURIZATION SYSTEM TRIP SYSTEM "B"<sup>#</sup></b>			
a. Reactor Vessel Water Level - Low Low Low, Level 1	2 <sup>(b)</sup>	1, 2, 3	30
b. Drywell Pressure - High	2 <sup>(b)</sup>	1, 2, 3	30
c. ADS Timer	1	1, 2, 3	31
d. Reactor Vessel Water Level - Low, Level 3 (Permissive)	1	1, 2, 3	31
e. LPCI Pump B and C Discharge Pressure - High (Permissive)	2/pump	1, 2, 3	31
f. Manual Initiation	<del>1/valve</del> 2/SYSTEM	1, 2, 3	32

## INSTRUMENTATION

TABLE 3.3.3-1 (Continued)

### EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

#### ACTION

- ACTION 30 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement:
- With one channel inoperable, place the inoperable channel in the tripped condition within one hour\* or declare the associated system(s) inoperable.
  - With more than one channel inoperable, declare the associated system(s) inoperable.
- ACTION 31 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, declare the associated ADS trip system or ECCS inoperable.
- ACTION 32 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 8 hours or declare the associated ADS ~~valve~~ or ECCS inoperable.
- TRIP SYSTEM
- ACTION 33 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement:
- For one trip system, place that trip system in the tripped condition within one hour\* or declare the HPCS system inoperable.
  - For both trip systems, declare the HPCS system inoperable.
- ACTION 34 - With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour\* or declare the HPCS system inoperable.

\*The provisions of Specification 3.0.4 are not applicable.

5. (MP&L P/L Item No. 285)

SUBJECT: Chlorine Detection System Technical Specification Surveillance Requirement 4.3.7.8

DESCRIPTION OF CHANGE: The proposed change to Technical Specification Surveillance Requirement 4.3.7.8 consists of changing the channel calibration frequency of the Chlorine Detection System from at least once per 18 months to at least once per 6 months.  
(Page 3/4 3-75)

JUSTIFICATION: Grand Gulf design consists of two Chlorine Detection Systems which when actuated starts the control room emergency filtration subsystems in the isolation mode of operation.

The proposed change to the Grand Gulf Technical Specifications is consistent with Regulatory Guide 1.95, Revision 1 recommendations. Changing the calibration frequency to at least once per 6 months is more conservative than the 18 month requirement of the BWR/6 Standard Technical Specifications and the 12 month interval recommended by the Chlorine Detector manufacturer. The performance of a channel calibration at least once per 6 months provides additional assurance that the Chlorine Detection System will function reliably. It should be noted that the Regulatory Guide 1.95 recommendation to perform a routine operability check on a weekly basis is already satisfied by the current Surveillance Requirement 4.3.7.8 frequency of at least once per 12 hours for channel checks.

SIGNIFICANT HAZARDS CONSIDERATION:

The proposed change to the Technical Specifications has been evaluated and determined to involve no significant hazard, as defined in 10 CFR 50.92. The change has been proposed to render the Technical Specification surveillance frequency consistent with Regulatory Guide 1.95 recommendations. The proposed change will result in a more stringent surveillance requirement and constitutes an additional control not presently included in the Technical Specifications.

The proposed change does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

Therefore, the proposed change does not involve a significant hazards consideration.

## INSTRUMENTATION

### CHLORINE DETECTION SYSTEM

#### LIMITING CONDITION FOR OPERATION

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3.3.7.8 Two independent chlorine detection systems shall be OPERABLE with their trip setpoints adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm.

APPLICABILITY: All OPERATIONAL CONDITIONS.

#### ACTION:

- a. With one chlorine detection system inoperable, restore the inoperable detection system to OPERABLE status within 7 days, or within the next 6 hours, initiate and maintain operation of at least one control room emergency filtration system subsystem in the isolation mode of operation.
- b. With both chlorine detection systems inoperable, within one hour initiate and maintain operation of at least one control room emergency filtration system subsystem in the isolation mode of operation.
- c. The provisions of Specification 3.0.4 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.3.7.8 Each of the above required chlorine detection systems shall be demonstrated OPERABLE by performance of a CHANNEL CHECK at least once per 12 hours, a CHANNEL FUNCTIONAL TEST at least once per 31 days and a CHANNEL CALIBRATION at least once per ~~10~~ months.