

Docket No. 50-423  
B14022

Attachment 1

Millstone Nuclear Power Station, Unit No. 3

Proposed Revision to Technical Specifications

Reactor Trip System and Engineered Safety  
Features Actuation System Instrumentation Response Times

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### 3/4.3 INSTRUMENTATION

#### 3/4.3.1 REACTOR TRIP SYSTEM INSTRUMENTATION

##### LIMITING CONDITION FOR OPERATION

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3.3.1 As a minimum, the Reactor Trip System instrumentation channels and interlocks of Table 3.3-1 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3-1.

ACTION:

As shown in Table 3.3-1.

##### SURVEILLANCE REQUIREMENTS

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4.3.1.1 Each Reactor Trip System instrumentation channel and interlock and the automatic trip logic shall be demonstrated OPERABLE by the performance of the Reactor Trip System Instrumentation Surveillance Requirements specified in Table 4.3-1.

4.3.1.2 The REACTOR TRIP SYSTEM RESPONSE TIME of each Reactor trip function shall be demonstrated to be within its limit at least once per 18 months. Each test shall include at least one train such that both trains are tested at least once per 36 months and one channel (to include input relays to both trains) per function such that all channels are tested at least once every N times 18 months where N is the total number of redundant channels in a specific Reactor trip function as shown in the "Total No. of Channels" column of Table 3.3-1.

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## INSTRUMENTATION

### 3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.3.2 The Engineered Safety Features Actuation System (ESFAS) instrumentation channels and interlocks shown in Table 3.3-3 shall be OPERABLE with their Trip Setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3-4.

APPLICABILITY: As shown in Table 3.3-3.

ACTION:

- a. With an ESFAS Instrumentation or Interlock Trip Setpoint trip less conservative than the value shown in the Trip Setpoint column but more conservative than the value shown in the Allowable Value column of Table 3.3-4, adjust the Setpoint consistent with the Trip Setpoint value.
- b. With an ESFAS Instrumentation or Interlock Trip Setpoint less conservative than the value shown in the Allowable Value column of Table 3.3-4, either:
  1. Adjust the Setpoint consistent with the Trip Setpoint value of Table 3.3-4, and determine within 12 hours that Equation 2.2-1 was satisfied for the affected channel, or
  2. Declare the channel inoperable and apply the applicable ACTION statement requirements of Table 3.3-3 until the channel is restored to OPERABLE status with its Setpoint adjusted consistent with the Trip Setpoint value.

Equation 2.2-1

$$Z + R + S \leq TA$$

Where:

Z = The value from Column Z of Table 3.3-4 for the affected channel,

R = The "as measured" value (in percent span) of rack error for the affected channel,

S = Either the "as measured" value (in percent span) of the sensor error, or the value from Column S (Sensor Error) of Table 3.3-4 for the affected channel, and

TA = The value from Column TA (Total Allowance) of Table 3.3-4 for the affected channel.

- c. With an ESFAS instrumentation channel or interlock inoperable, take the ACTION shown in Table 3.3-3.

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## INSTRUMENTATION

### BASES

#### REACTOR TRIP SYSTEM INSTRUMENTATION and ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION (Continued)

the sensor from its calibration point or the value specified in Table 3.3-4, in percent span, from the analysis assumptions. Use of Equation 3.3-1 allows for a sensor drift factor, an increased rack drift factor, and provides a threshold value for REPORTABLE EVENTS.

The methodology to derive the Trip Setpoints is based upon combining all of the uncertainties in the channels. Inherent to the determination of the Trip Setpoints are the magnitudes of these channel uncertainties. Sensor and rack instrumentation utilized in these channels are expected to be capable of operating within the allowances of these uncertainty magnitudes. Rack drift in excess of the Allowable Value exhibits the behavior that the rack has not met its allowance. Being that there is a small statistical chance that this will happen, an infrequent excessive drift is expected. Rack or sensor drift, in excess of the allowance that is more than occasional, may be indicative of more serious problems and should warrant further investigation.

The measurement of response time at the specified frequencies provides assurance that the Reactor trip and the Engineered Safety Features actuation associated with each channel is completed within the time limit assumed in the safety analyses. The RTS and ESF response times are included in the Operating Procedure OP-3273 "Technical Requirements--Supplementary Technical Specifications." No credit was taken in the analyses for those channels with response times indicated as not applicable. Response time may be demonstrated by any series of sequential, overlapping, or total channel test measurements provided that such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either: (1) in place, onsite, or offsite test measurements, or (2) utilizing replacement sensors with certified response time. Detector response times may be measured by the in situ on line noise analysis-response time degradation method described in the Westinghouse Topical Report, "The Use of Process Noise Measurements To Determine Response Characteristics of Protection Sensors in U.S. Plants," August 1983.