

NPF-38-198

ATTACHMENT A

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TABLE 3.3-3 (Continued)

## ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
4. MAIN STEAM LINE ISOLATION					
a. Manual (Trip Buttons)	2 sets of 2 per steam generator	1 set of 2 per steam generator	2 sets of 2 per operat- ing steam generator	1, 2, 3	16
b. Steam Generator Pressure - Low	4/steam generator	2/steam generator	3/steam generator	1, 2, 3	13*, 14*
c. Containment Pressure - High	4	2	3	1, 2, 3	13*, 14*
d. Automatic Actuation Logic	4	2	3	1, 2, 3	12
5. SAFETY INJECTION SYSTEM SUMP RECIRCULATION (RAS)					
a. Manual RAS (Trip Buttons)	2	1	2	1, 2, 3, 4	12
b. Refueling Water Storage Pool - Low	4	2	3	1, 2, 3, 4	13*, 14*
c. Automatic Actuation Logic	4	2	3	1, 2, 3, 4	12
6. LOSS OF POWER (LOV)					
a. 4.16 kV Emergency Bus Undervoltage (Loss of Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18
b. 480 V Emergency Bus Undervoltage (Loss of Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18
c. 4.16 kV Emergency Bus Undervoltage (Degraded Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18

TABLE 3.3-3 (Continued)

TABLE NOTATION

ACTION 18 - With more than one channel inoperable, or if the inoperable channel cannot be placed in the trip (D.C. Relay energized) condition, declare the associated Emergency Diesel Generator inoperable and take the ACTION required by Specification 3.8.1.1. The surveillance requirements of Table 4.3-2 are waived for all channels while this action requirement is in effect.

### 3/4.3 INSTRUMENTATION

#### BASES

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#### 3/4.3.1 and 3/4.3.2 REACTOR PROTECTIVE AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEMS INSTRUMENTATION

The OPERABILITY of the Reactor Protective and Engineered Safety Features Actuation Systems instrumentation and bypasses ensures that (1) the associated Engineered Safety Features Actuation action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundancy, and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the safety analyses.

The redundancy design of the Control Element Assembly Calculators (CEAC) provides reactor protection in the event one or both CEACs become inoperable. If one CEAC is in test or inoperable, verification of CEA position is performed at least every 4 hours. If the second CEAC fails, the CPCs will use DNBR and LPD penalty factors to restrict reactor operation to some maximum fraction of RATED THERMAL POWER. If this maximum fraction is exceeded, a reactor trip will occur.

The Surveillance Requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability. The quarterly frequency for the channel functional tests for these systems comes from the analyses presented in topical report CEN-327: RPS/ESFAS Extended Test Interval Evaluation, as supplemented.

RPS/ESFAS Trip Setpoints values are determined by means of an explicit setpoint calculation analysis. A Total Loop Uncertainty (TLU) is calculated for each RPS/ESFAS instrument channel. The Trip Setpoint is then determined by adding or subtracting the TLU from the Analytical Limit (add TLU for decreasing process value; subtract TLU for increasing process value). The Allowable Value is determined by adding an allowance between the Trip Setpoint and the Analytical Limit to account for RPS/ESFAS cabinet Periodic Test Errors (PTE) which are present during a CHANNEL FUNCTIONAL TEST. PTE combines the RPS/ESFAS cabinet reference accuracy, calibration equipment errors (M&TE), and RPS/ESFAS cabinet bistable Drift. Periodic testing assures that actual setpoints are within their Allowable Values. A channel is inoperable if its actual setpoint is not within its Allowable Value and corrective action must be taken. Operation with a trip set less conservative than its setpoint, but within its specified ALLOWABLE VALUE is acceptable on the basis that the difference between each trip Setpoint and the ALLOWABLE VALUE is equal to or less than the Periodic Test Error allowance assumed for each trip in the safety analyses.

### 3/4.3 INSTRUMENTATION

#### BASES (Cont'd)

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#### 3/4.3.1 and 3/4.3.2 REACTOR PROTECTIVE AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEMS INSTRUMENTATION

The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the safety analyses. 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 times.

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ATTACHMENT B

TABLE 3.3-3 (Continued)

## ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNITS		TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ACTION
4.	MAIN STEAM LINE ISOLATION					
a.	Manual (Trip Buttons)	2 sets of 2 per steam generator	1 set of 2 per steam generator	2 sets of 2 per operat- ing steam generator	1, 2, 3	16
b.	Steam Generator Pressure - Low	4/steam generator	2/steam generator	3/steam generator	1, 2, 3	13 *, 14*
c.	Containment Pressure - High	4	2	3	1, 2, 3	13 *, 14*
d.	Automatic Actuation Logic	4	2	3	1, 2, 3	12
5.	SAFETY INJECTION SYSTEM SUMP RECIRCULATION (RAS)					
a.	Manual RAS (Trip Buttons)	2	1	2	1, 2, 3, 4	12
b.	Refueling Water Storage Pool - Low	4	2	3	1, 2, 3, 4	19*, 20
c.	Automatic Actuation Logic	4	2	3	1, 2, 3, 4	12
6.	LOSS OF POWER (LOV)					
a.	4.16 kV Emergency Bus Undervoltage (Loss of Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18
b.	480 V Emergency Bus Undervoltage (Loss of Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18
c.	4.16 kV Emergency Bus Under- voltage (Degraded Voltage)	3/bus	3/bus	3/bus	1, 2, 3	17, 18



TABLE 3.3-3 (Continued)

TABLE NOTATION

- ACTION 18 - With more than one channel inoperable, or if the inoperable channel cannot be placed in the trip (D.C. Relay energized) condition, declare the associated Emergency Diesel Generator inoperable and take the ACTION required by Specification 3.8 1.1. The surveillance requirements of Table 4.3-2 are waived for all channels while this action requirement is in effect.
- ACTION 19 - With the number of channels OPERABLE one less than the Total Number of Channels, STARTUP and/or POWER OPERATION may continue in the other applicable MODE(S) provided the inoperable channel is placed in the bypassed or tripped condition within 1 hour. If the inoperable channel is to remain in the bypassed condition, the desirability of maintaining this channel in the bypassed condition shall be documented by the Plant Operations Review Committee in accordance with plant administrative procedures. The channel shall be returned to OPERABLE status no later than prior to entry into the applicable MODE(S) following the next COLD SHUTDOWN. If a channel is required to be placed in the tripped condition comply with ACTION 20b.
- ACTION 20 - With the number of channels OPERABLE one less than the Minimum Channels OPERABLE requirement, operation in the applicable MODES may continue provided the following conditions are satisfied:
- a. Verify that one of the inoperable channels has been bypassed and place the other inoperable channel in the tripped condition within 1 hour.
  - b. Restore at least one of the inoperable channels to OPERABLE status within 48 hours or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. Subsequent operation in the applicable MODES may continue if one channel is restored to OPERABLE status and the provisions of ACTION 19 are satisfied.



### 3/4.3 INSTRUMENTATION

#### BASES

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#### 3/4.3.1 and 3/4.3.2 REACTOR PROTECTIVE AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEMS INSTRUMENTATION

The OPERABILITY of the Reactor Protective and Engineered Safety Features Actuation Systems instrumentation and bypasses ensures that (1) the associated Engineered Safety Features Actuation action and/or reactor trip will be initiated when the parameter monitored by each channel or combination thereof reaches its setpoint, (2) the specified coincidence logic is maintained, (3) sufficient redundancy is maintained to permit a channel to be out of service for testing or maintenance, and (4) sufficient system functional capability is available from diverse parameters.

The OPERABILITY of these systems is required to provide the overall reliability, redundancy, and diversity assumed available in the facility design for the protection and mitigation of accident and transient conditions. The integrated operation of each of these systems is consistent with the assumptions used in the safety analyses.

The redundancy design of the Control Element Assembly Calculators (CEAC) provides reactor protection in the event one or both CEACs become inoperable. If one CEAC is in test or inoperable, verification of CEA position is performed at least every 4 hours. If the second CEAC fails, the CPCs will use DNBR and LPD penalty factors to restrict reactor operation to some maximum fraction of RATED THERMAL POWER. If this maximum fraction is exceeded, a reactor trip will occur.

Table 3.3-3 ACTION 19 allows for continued operation in the applicable MODES with one of the Refueling Water Storage Pool (RWSP) - Low channels inoperable provided the channel is placed in the bypass condition within 1 hour. The inoperable channel must be restored to OPERABLE status prior to entering MODE 4 following the next MODE 5 entry. With one of the RWSP - Low channels inoperable and in bypass, and testing or repairs is necessary on one of the remaining channels, ACTION 20 must be entered.

Table 3.3-3 ACTION 20 allows for continued operation in the applicable MODES with two of the RWSP - Low channels inoperable provided that one of the inoperable channels is bypassed and the other inoperable channel is placed in the tripped condition within one hour.

One of the inoperable RWSP - Low channels must be restored to OPERABLE status within 48 hours to allow removal of the channel from the tripped condition. The allowed time is acceptable because operating experience has demonstrated the low probability of the following sequence of events occurring: the need to place one RWSP - Low channel in the tripped condition while another RWSP - Low channel is in bypass, the receipt of a valid Safety Injection Actuation, Signal Actuation, and a coincident failure of one of the two remaining OPERABLE RWSP - Low channels. These conditions could cause the Emergency Core Cooling System and Containment Spray System suction to be supplied from the Safety Injection System Sump prematurely due to containment pressure being higher than RWSP outlet pressure and loss of the Low Pressure Safety Injection Systems.

When one of the inoperable channels is restored to OPERABLE status, subsequent operation in the applicable MODES may continue in accordance with the provisions of ACTION 19.

## INSTRUMENTATION

### BASES (Cont'd)

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#### 3/4.3.1 and 3/4.3.2 REACTOR PROTECTIVE AND ENGINEERED SAFETY FEATURES ACTUATION SYSTEMS INSTRUMENTATION

ACTION 19 is annotated with an asterisk to allow the changing of MODES even though one channel is bypassed. MODE changes with this configuration are allowed, to permit maintenance and testing on the inoperable channel. In this configuration, the protection system is in a two-out-of-three logic, and the probability of a random failure affecting two of the OPERABLE channels is remote. ACTION 20 does not have this annotation as a single failure could cause the Emergency Core Cooling System and Containment Spray System suction to be supplied from the Safety Injection System Sump prematurely and loss of the Low Pressure Safety Injection Systems.

The Surveillance Requirements specified for these systems ensure that the overall system functional capability is maintained comparable to the original design standards. The periodic surveillance tests performed at the minimum frequencies are sufficient to demonstrate this capability.

The quarterly frequency for the channel functional tests for these systems comes from the analyses presented in topical report CEN-327: RPS/ESFAS Extended Test Interval Evaluation, as supplemented.

RPS/ESFAS Trip Setpoints values are determined by means of an explicit setpoint calculation analysis. A total loop uncertainty (TLU) is calculated for each RPS/ESFAS instrument channel. The Trip setpoint is then determined by adding or subtracting the TLU from the Analytical Limit (add TLU for decreasing process value; subtract TLU for increasing process value). The Allowable Value is determined by adding an allowance between the Trip Setpoint and the Analytical Limit to account for RPS/ESFAS cabinet Periodic Test Errors (PTE) which are present during a CHANNEL FUNCTIONAL TEST. PTE combines RPS/ESFAS cabinet reference accuracy, calibration equipment errors (M&TE), and RPS/ESFAS cabinet bistable Drift. Periodic testing assures that actual setpoints are within their Allowable Values. A channel is inoperable if its actual setpoint is not within its Allowable Value and corrective action must be taken. Operation with a trip set less conservative than its Trip Setpoint but within its specified Allowable Value is acceptable on the basis that the difference between each Trip Setpoint and the Allowable Value is equal to or less than the Periodic Test Error allowance assumed for each trip in the safety analyses.

The measurement of response time at the specified frequencies provides assurance that the protective and ESF action function associated with each channel is completed within the time limit assumed in the safety analyses. 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 times.