

BASES (continued)

ACTIONS

A.1

If one ASW train is inoperable, action must be taken to restore OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE ASW train is adequate to perform the heat removal function. However, the overall reliability is reduced because a single failure in the OPERABLE ASW train could result in loss of ASW system function. The Note indicates that the applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops-MODE 4," should be entered if an inoperable ASW train results in an inoperable decay heat removal train. This is an exception to LCO 3.0.6 and ensures the proper actions are taken for these components. The 72 hour Completion Time is based on the redundant capabilities afforded by the OPERABLE train, and the low probability of a DBA occurring during this time period.

The 72 hour Completion Time is modified by a note that allows a one-time Completion Time of 144 hours for ASW pump 1-1, for Unit 1 cycle 23 to support emergent replacement of the ASW pump 1-1 motor. The one-time Completion Time of 144 hours is reasonable considering the capabilities of the other ASW Pump 1-2 to perform the heat removal function, the cross-tie capabilities of ASW from Unit 2, the low probability of a design basis accident occurring during this period, and the one-time use of a 144-hour Completion Time.

B.1 and B.2

If the ASW train cannot be restored to OPERABLE status within the associated Completion Times, the unit must be placed in a MODE in which overall plant risk is reduced. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 4 within 12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 4). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 4, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action B.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment

addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

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