

Pre-Submittal Meeting

**Relocation of Technical
Specification 3.9.3 “Nuclear
Instrumentation” to a Licensee
Controlled Document**

Comanche Peak Nuclear Power Plant



Agenda

- Objective of the meeting.
- Proposed Technical Specification (TS) change.
- Justification for the TS change.
- Open Discussion.

Objective of the Meeting

- To discuss the relocation of TS 3.9.3, Nuclear Instrumentation,” to a licensee- controlled document.

Proposed TS Change

- Technical Specification (TS) 3.9.3 “Nuclear Instrumentation” requires two source range channels to be OPERABLE in MODE 6.
- TS 3.9.3 will be deleted from TS and relocated to the Technical Requirements Manual (TRM).
- The requirements of the LCO, Required Actions, and Surveillances will be unchanged upon relocation to the TRM.
- No proposed change to any operational requirements for source range NIS in MODE 6.

Proposed TS Change

- TS 3.9.3, “Nuclear Instrumentation,” can be relocated from the TS to the TRM because it does not satisfy any of the four criteria in criteria of 10CFR50.36(c)(2)(ii) to be included in the TS as an LCO.
- Consistent with NRC’s “Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors”.
- Consistent with TS 5.5.17 for TRM content.
- TS 5.5.17 states that the TRM “contains selected requirements which do not meet the criteria for inclusion in the Technical Specification but are important to the operation of CPNPP”.
- The TRM is therefore the appropriate location for the control of the Nuclear Instrumentation in MODE 6.

Justification for the TS Change

- The Source Range channels do not satisfy Criterion 1 because they are not used to detect and indicate in the control room a significant abnormal degradation of the reactor coolant pressure boundary.
- The Source Range channels do not satisfy Criterion 2 because they are not a process variable for an initial condition of any design basis accident or transient analysis.

Justification for the TS Change (continued)

- Criterion 3 applies to any SSC that is part of a primary success path for the mitigation of a design basis accident or transient.
 - A fuel handling accident is the only design basis accident or transient for CPNPP in MODE 6.
 - The Source Range channels do not mitigate this event.
 - CPNPP does not analyze a boron dilution event in MODE 6.
 - TS 3.9.2 “Unborated Water Source Isolation Valves” isolates all dilution sources.
 - Per the TS 3.9.2 Bases (consistent with Standard TS Bases) isolation of unborated water sources precludes the occurrence of a boron dilution event.
 - Therefore, CPNPP does not analyze a Mode 6 boron dilution event, and therefore the SR channels do not mitigate a boron dilution event.
 - Therefore, the Source Range channels do not satisfy Criterion 3 for inclusion in the TS.

Justification for the TS Change (continued)

- Criterion 4 applies to any SSC that OE or PRA has shown to be significant to the public health and safety.
- The CPNPP plant-specific PRA does not address Mode 6 operations.
- No CPNPP OE identified any events in Mode 6 where the failure of the Source Range channels had a significant adverse effect on the public health and safety.
- A search of publicly available generic industry PRA studies did not identify the failure of the Source Range channels as significant for severe accident scenarios in Mode 6.
- A search of generic industry OE similarly did not identify any events in Mode 6 where the failure of the Source Range channels had a significant adverse effect on the public health and safety.
- Therefore, the Source Range channels do not satisfy Criterion 4 for inclusion in the TS.

Precedent

- There are numerous precedent license amendments where the criteria of 10 CFR 50.36c(2)(ii) have been applied to a TS LCO as a basis to relocate the requirement to a licensee-controlled document.
 - Salem LAR S22-07 to relocate TS requirements for reactor head vents to TRM, Submitted August 31, 2022 and approved by NRC March 13, 2023 EPID L-2022-LLA-0133.
 - Waterford LAR W3F1-2021-0004 to relocate Chemical Detection Systems TS to TRM, Submitted April 5, 2021 and approved by NRC April 29, 2022 EPID L-2021-LLA-0061.

Conclusion

- TS 3.9.3 “Nuclear Instrumentation” can be relocated from the TS to the TRM because it does not satisfy any of the four criteria in criteria of 10CFR50.36(c)(2)(ii) to be included in the TS as an LCO.

Open Discussion

Questions?

