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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Oconee Nuclear Station
Docket Numbers 50-269, 270, and 287
Technical Specification Bases Changes

Please find attached revisions to various Bases of Technical Specifications which were approved by Station Management on January 27, 2000. These changes were implemented on January 31, 2000. During the conversion of ITS to Microsoft Word, the proof review identified a number of typographical or editorial errors in the Bases of certain Technical Specifications. These errors were not corrected during the conversion to Microsoft Word since the conversion was not a Bases change. Additionally, an enhancement to the Bases for SR 3.6.3.2 and SR 3.6.3.3. is made to clarify that the administrative controls for a valve consist of stationing a dedicated individual at the valve, who is in continuous communication with the control room and to indicate that he can be responsible for closing more than one valve provided that the valves are all in close proximity and can be closed in a timely manner.

Attachment 1 contains the new Technical Specification Bases pages and Attachment 2 contains the markup version of the Bases pages.

If any additional information is needed, please contact Larry E. Nicholson, (864-885-3292)

Very truly yours,

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Attachment 1

BASES

SURVEILLANCE
REQUIREMENTS
(continued)SR 3.5.2.3

Periodic surveillance testing of HPI pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems is required by Section XI of the ASME Code (Ref. 5). SRs are specified in the Inservice Testing Program, which encompasses Section XI of the ASME Code.

SR 3.5.2.4 and SR 3.5.2.5

These SRs demonstrate that each automatic HPI valve actuates to the required position on an actual or simulated ESPS signal and that each HPI pump starts on receipt of an actual or simulated ESPS signal. This SR is not required for valves that are locked, sealed, or otherwise secured in position under administrative controls. The test will be considered satisfactory if control board indication verifies that all components have responded to the ESPS actuation signal properly (all appropriate ESPS actuated pump breakers have opened or closed and all ESPS actuated valves have completed their travel). The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. The 18 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment. The actuation logic is tested as part of the ESPS testing, and equipment performance is monitored as part of the Inservice Testing Program.

SR 3.5.2.6

Periodic inspections of the reactor building sump suction inlet (for LPI-HPI flow path) ensure that it is unrestricted and stays in proper operating condition. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage, on the need to preserve access to the location, and on the potential for an unplanned transient if the Surveillance were performed with the reactor at power. This Frequency has been found to be sufficient to detect abnormal degradation and has been confirmed by operating experience.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.1.2

Maintaining the containment OPERABLE requires compliance with the Type B and C leakage rate test requirements of 10 CFR 50, Appendix J, Option A (Ref. 1), as modified by approved exemptions. As left leakage prior to the first startup after performing a required 10 CFR 50, Appendix J, Option A, leakage test is required to be $< 0.6 L_a$ for combined Type B and C leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0 L_a$. At $\leq 1.0 L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by Appendix J, Option A, as modified by approved exemptions. Thus, SR 3.0.2 (which allows Frequency extensions) does not apply. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.3

This SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are as described in Specification 5.5.7, "Pre-stressed Concrete Containment Tendon Surveillance Program."

REFERENCES

1. 10 CFR 50, Appendix J, Option A and B.
2. UFSAR, Sections 15.13 and 15.14.
3. UFSAR, Section 6.2.
4. 10 CFR 50.36.

B 3.6 CONTAINMENT SYSTEMS

B 3.6.2 Containment Air Locks

BASES

BACKGROUND Containment air locks, also known as the personnel hatch and the emergency hatch, form part of the containment pressure boundary and provide a means for personnel access during all MODES of operation.

Each air lock is nominally a right circular cylinder with a door at each end. The doors are interlocked to prevent simultaneous opening. During periods when containment is not required to be OPERABLE, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. Each air lock door has been designed and is tested to certify its ability to withstand a pressure in excess of the maximum expected pressure following an accident in containment. As such, closure of a single door supports containment OPERABILITY. Each of the outer doors contains double gasketed seals and local leakage rate testing capability to ensure pressure integrity. To effect a leak tight seal, the air lock design uses pressure seated doors (i.e., an increase in containment internal pressure results in increased sealing force on each door). Each personnel air lock door is provided with limit switches that provide control room indication of door position.

The containment air locks form part of the containment pressure boundary. As such, air lock integrity and leak tightness are essential for maintaining the containment leakage rate within limit in the event of an accident. Not maintaining air lock integrity or leak tightness may result in a leakage rate in excess of that assumed in the unit safety analysis.

APPLICABLE SAFETY ANALYSES The accident that results in a release of radioactive material within containment is a loss of coolant accident (LOCA) (Ref. 2). In the analysis of this accident, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.25% of containment air weight per day (Ref. 3). This leakage rate is defined in 10 CFR 50, Appendix J, Option A and B (Ref. 1), as L_a : the maximum allowable containment leakage rate at the calculated

BASES (continued)

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.3.2

This SR requires verification that each containment isolation manual and non-automatic power operated valve and blind flange located outside containment and not locked, sealed, or otherwise secured, and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those containment isolation valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for containment isolation valves outside containment is relatively easy, the 31 day Frequency is based on engineering judgment and was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves open under administrative controls are not required to meet the SR during the time the valves are open. These administrative controls consist of stationing a dedicated individual at the valve, who is in continuous communication with the control room. The dedicated individual can be responsible for closing more than one valve provided that the valves are all in close vicinity and can be closed in a timely manner. This SR does not apply to valves that are locked, sealed, or otherwise secured, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is low.

SR 3.6.3.3

This SR requires verification that each containment isolation manual and non-automatic power operated valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured, and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. For containment isolation valves inside containment, the Frequency of "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate, since these containment isolation valves are operated under administrative controls and the probability of their misalignment is low. The SR specifies that containment isolation valves open under administrative controls are not

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REQUIREMENTS

SR 3.6.3.3 (continued)

required to meet the SR during the time they are open. These administrative controls consist of stationing a dedicated individual at the valve, who is in continuous communication with the control room. The dedicated individual can be responsible for closing more than one valve provided that the valves are all in close vicinity and can be closed in a timely manner. This SR does not apply to valves that are locked, sealed, or otherwise secured, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in their proper position, is small.

SR 3.6.3.4

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.

SR 3.6.3.5

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following an accident. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This SR is not required for valves that are locked, sealed, or otherwise secured in position under administrative controls. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass this Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

BASES (continued)

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SR 3.7.1.1

This SR verifies the OPERABILITY of the MSRVs by the verification of MSRV lift setpoints in accordance with the Inservice Testing Program. The safety and relief valve tests are performed in accordance with ANSI/ASME OM-1-1987 (Ref. 5) and include the following for MSRVs:

- a. Visual examination;
- b. Seat tightness determination;
- c. Setpoint pressure determination (lift setting);
- d. Compliance with owner's seat tightness criteria; and
- e. Verification of the balancing device integrity on balanced valves.

The ANSI/ASME Standard requires the testing of all valves every 5 years, with a minimum of 20% of the valves tested every 24 months. Reference 4 provides the activities and frequencies necessary to satisfy the requirements.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSRVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSRVs are not tested at hot conditions, the lift setting pressure must be corrected to ambient conditions of the valve at operating temperature and pressure.

REFERENCES

1. UFSAR, Section 10.3.
2. ASME, Boiler and Pressure Vessel Code, Section III, Article NC-7000, Class 2 Components.
3. UFSAR, Chapter 15.
4. UFSAR, Section 10.3.3.
5. 10 CFR 50.36.
6. ANSI/ASME OM-1-1987.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.2.2

This SR verifies that TSV closure time of each TSV is ≤ 15.0 seconds on an actual or simulated actuation signal from Channel B. This Surveillance is normally performed upon returning the unit to operation following a refueling outage.

The Frequency for this SR is 18 months. The 18 month Frequency to demonstrate valve closure time is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

This test is conducted in MODE 3, with the unit at operating temperature and pressure, as discussed in the Reference 5 exercising requirements. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows delaying testing until MODE 3 in order to establish conditions consistent with those under which the acceptance criterion was generated.

REFERENCES

1. UFSAR, Section 10.3.
 2. UFSAR, Section 15.13.
 3. 10 CFR 50.36.
 4. 10 CFR 100.11.
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.10.4 (continued)

designed to maintain a slight negative pressure in the penetration rooms with respect to outside atmosphere to prevent unfiltered LEAKAGE. The PRVS is designed to maintain this negative pressure at a flow rate of $1000 \pm 10\%$ cfm from the area. The Frequency of 18 months on a STAGGERED TEST BASIS is consistent with industry practice and other filtration SRs.

SR 3.7.10.5

Operating the PRVS filter bypass valve is necessary to ensure that the system functions properly. The OPERABILITY of the PRVS filter bypass valve is verified if it can be opened. An 18 month Frequency is consistent with the guidance in Reference 6.

REFERENCES

1. UFSAR, Section 6.5.1.
 2. UFSAR, Section 9.4.7.
 3. UFSAR, Section 15.15.
 4. 10 CFR 20.
 5. 10 CFR 50.36.
 6. Regulatory Guide 1.52.
 7. 10 CFR 100.
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BASES

APPLICABLE SAFETY ANALYSES (continued) 21.34 ft, and a minimum decay time of 72 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling or cask drop accident is adequately captured by the water, and offsite doses are maintained within allowable limits (Ref. 7).

The Spent Fuel Pool water level satisfies Criterion 2 and 3 of 10 CFR 50.36 (Ref. 7).

LCO The specified water level preserves the assumptions of the fuel handling and cask drop accident analyses (Ref. 3). As such, it is the minimum required for fuel storage and movement within the Spent Fuel Pool or movement of the cask over the Spent Fuel Pool.

APPLICABILITY This LCO applies during movement of irradiated fuel assemblies in the Spent Fuel Pool or movement of the cask over the Spent Fuel Pool since the potential for a release of fission products exists.

ACTIONS Required Actions A.1 and A.2 are modified by a Note indicating that LCO 3.0.3 does not apply.

If moving irradiated fuel assemblies or a cask while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies or a cask while in MODES 1, 2, 3, and 4, the fuel or cask movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies or a cask is not sufficient reason to require a reactor shutdown.

A.1

When the initial conditions for an accident cannot be met, immediate action must be taken to preclude the occurrence of an accident. With the Spent Fuel Pool at less than the required level, the movement of fuel assemblies in the Spent Fuel Pool is immediately suspended. This effectively precludes the occurrence of a fuel handling accident. In such a case, unit procedures control the movement of other (non cask) loads over the spent fuel. This does not preclude movement of a fuel assembly to a safe position.

BASES (continued)

APPLICABILITY This LCO applies whenever fuel assemblies are stored in the spent fuel pool.

ACTIONS A.1 and A.2

The Required Actions are modified by a Note indicating that LCO 3.0.3 does not apply.

If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of fuel assemblies is not a sufficient reason to require a reactor shutdown.

When the concentration of boron in the fuel storage pool is less than required, immediate action must be taken to preclude the occurrence of an accident or to mitigate the consequences of an accident in progress. This is achieved by immediately suspending the movement of the fuel assemblies. This does not preclude movement of a fuel assembly to a safe position. Immediate action is also required to initiate action to restore the SFP boron concentration to within limits.

SURVEILLANCE
REQUIREMENTS SR 3.7.12.1

This SR verifies that the concentration of boron in the fuel storage pool is within the required limit. As long as this SR is met, the analyzed incidents are fully addressed. The 31 day Frequency is appropriate because no major replenishment of pool water is expected to take place over a short period of time and verification is required after each makeup to the SFP. The verification after each makeup should be completed within 12 hours after a 24 hour recirculation period to allow for mixing. This Completion Time is appropriate since no major replenishment of pool water is expected to take place over this period.

- REFERENCES
1. ANSI N-16.1-1975.
 2. Letter from B.K. Grimes (USNRC) to Power Reactor Licensees dated April 14, 1978.
 3. 10 CFR 50.36.
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BASES (continued)

ACTIONS

A.1

With one CRVS train inoperable for the control area, action must be taken to restore the CRVS train to OPERABLE status within 30 days. In this Condition, the remaining OPERABLE CRVS train is adequate to maintain the control area temperature within limits. However, the overall reliability is reduced because a failure in the OPERABLE CRVS train could result in a loss of CRVS cooling function. The 30 day Completion Time is based on the low probability of a loss of CRVS cooling component and the time necessary to perform repairs to CRVS cooling equipment.

B.1

With one WC train inoperable for a control area portion, action must be taken to restore the WC train to OPERABLE status within 30 days. In this Condition, the remaining OPERABLE WC train is adequate to maintain the control area portion temperature within limits. However, the overall reliability is reduced because a failure in the OPERABLE WC train could result in a loss of CRACS cooling function. The 30 day Completion Time is based on the low probability of a loss of WC cooling component, and on the time necessary to perform repairs to WC cooling equipment.

C.1

With the control room area air temperature outside its limit, action must be taken to restore the air temperature to within the limit within 7 days. If the control room area air temperature exceeds its limit, the ability of a single train of CRACS to maintain control room area temperature may be affected. The Completion Time of 7 days is reasonable considering the remaining CRACS train available to perform the required temperature control function and the low probability of an event occurring that would require the CRACS operation during that time.

The Required Actions are modified by a Note that states LCO 3.0.4 is not applicable. In consideration of the redundant CRACS train available, the small variation in temperature expected between 12 hour surveillances, and the marginal impact small temperature variations may have on the ability of a CRACS train to maintain the control room temperature within limits, an exception to LCO 3.0.4 is applicable for this condition.

BASES

ACTIONS C.1, C.2.1, C.2.2.1, C.2.2.2, C.2.2.3, C.2.2.4, and C.2.2.5 (continued)

LCO 3.3.17, "EPSL Automatic Transfer Function;"

LCO 3.3.18, "EPSL Voltage Sensing Circuits;"

LCO 3.3.19, "EPSL 230 kV Switchyard DGVP;" and

LCO 3.3.21, "EPSL Keowee Emergency Start Function."

This increases the probability, even in the unlikely event of an additional failure, that the DC power system and the 120 VAC Vital Instrumentation power panelboards will function as required to support EPSL, power will not be lost to ES equipment, and EPSL will function as required.

Verifying by administrative means allows a check of logs or other information to determine the OPERABILITY status of required equipment in place of requiring unique performance of Surveillance Requirements. If the AC Source is subsequently determined inoperable, or an LCO stated in Required Action C.2.2.3 is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

Required Action C.2.2.4 requires verifying alternate power source capability by performing SR 3.8.1.16. This confirms that entry into Condition C is due only to an inoperable main step-up transformer or an inoperable KHU, as applicable. If SR 3.8.1.16 is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

D.1, D.2 and D.3

With the KHU or its required underground emergency power path inoperable, sufficient AC power sources remain available to ensure safe shutdown of the unit in the event of a transient or accident. Operation may continue for 72 hours if the remaining KHU and its required overhead emergency power path are tested using SR 3.8.1.4 within one hour if not performed in the previous 12 hours. SR 3.8.1.4 is only required to be performed when the KHU associated with the overhead emergency power path is OPERABLE. This Required Action provides assurance that no undetected failures have occurred in the overhead emergency power path. Since Required Action D.1 only specifies

BASES

ACTIONS

H.1 and H.2 (continued)

This increases the probability, even in the unlikely event of an additional failure, that the DC power system and the 120 VAC Vital Instrumentation power panelboards will function as required to support EPSL, power will not be lost to ES equipment, and EPSL will function as required.

Verifying by administrative means allows a check of logs or other information to determine the OPERABILITY status of required equipment in place of requiring unique performance of Surveillance Requirements. If the AC Source is subsequently determined inoperable, or an LCO stated in the Note to Condition H is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

With both standby buses energized from an LCT via an isolated power path (100 kV transmission circuit electrically separated from the system grid and all offsite loads), a high degree of reliability for the emergency power system is provided. In this configuration, the LCT is serving as a second emergency power source, however, since the Oconee Units are vulnerable to a single failure of the 100 kV transmission circuit a time limit of 60 hours is imposed. Required Action H.1 permits the standby buses to be re-energized by an LCT within 1 hour in the event this source is subsequently lost.

If both emergency power paths are restored, unrestricted operation may continue. If only one power path is restored, operation may continue per ACTIONS C or D.

I.1, I.2, and I.3

With both KHUs or their required emergency power paths inoperable for reasons other than Conditions G and H, insufficient standby AC power sources are available to supply the minimum required ES functions. In this Condition, the offsite power system is the only source of AC power available for this level of degradation. The risk associated with continued operation for one hour without an emergency power source is considered acceptable due to the low likelihood of a LOOP during this time period, and because of the potential for grid instability caused by the simultaneous shutdown of all three units. This instability would increase the probability of a total loss of AC power. Operation with both KHUs or their required power paths inoperable is permitted for 12 hours provided

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ACTIONS
(continued)

L.1, L.2, and L.3

With an AC Source inoperable or LCO not met, as stated in Note for Condition H entry; or with an AC Source inoperable or LCO not met, as stated in Required Action C.2.2.3 when in Condition C for > 72 hours; or with an AC Source inoperable or LCO not met, as stated in Required Action I.2 or J.2 when in Conditions I or J for > 1 hour; or with SR 3.8.1.16 not met, Required Action L.1, L.2 and L.3 requires restoration within four hours. Condition L is modified by a Note indicating that separate Condition entry is permitted for each inoperable AC Source, and LCO or SR not met. The Required Action is modified by a Note that allows the remaining OPERABLE KHU and its required emergency power path to be made inoperable for up to 12 hours if required to restore both KHUs and their required emergency power paths to OPERABLE status. This note is necessary since certain actions such as dewatering the penstock may be necessary to restore the inoperable KHU although these actions would also cause both KHUs to be inoperable.

The purpose of this Required Action is to restrict the allowed outage time for an inoperable AC Source or equipment required by an LCO when in Conditions C, H, I or J. For Conditions I and J when the LCOs stated are initially not met, the maximum Completion Time is four hours or the remaining Completion Time allowed by the stated LCO, whichever is shorter.

M.1 and M.2

If a Required Action and associated Completion Time for Condition C, F, G, H, I, J, K or L are not met; or if a Required Action and associated Completion Time are not met for Required Action D.1 or D.3, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and to MODE 5 within 84 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

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SR 3.8.1.4 (continued)

after removing the KHU from the overhead emergency power path. This surveillance can be satisfied by first demonstrating the ability of the KHU associated with the underground emergency path to energize the underground path then synchronizing the KHU to the overhead emergency power path. The SR is modified by a Note indicating that the requirement to energize the underground emergency power path is not applicable when the overhead disconnects are open for the KHU associated with the underground emergency power path or 2) when complying with Required Action D.1. The latter exception is necessary since Required Action D.1 continues to be applicable when both KHUs are inoperable.

The 31 day Frequency for this Surveillance was determined to be adequate based on operating experience to provide reliability verification without excessive equipment cycling for testing.

SR 3.8.1.5

This surveillance verifies OPERABILITY of the trip functions of each closed SL and each closed N breaker. Neither of these breakers have any automatic close functions; therefore, only the trip coils require verification. Cycling of each breaker demonstrates functional OPERABILITY and the coil monitor circuits verify the integrity of each trip coil. The 31 day frequency is based on operating experience.

This SR modified by a Note that states it is not required to be performed for an SL breaker when its standby bus is energized from a LCT via an isolated power path. This is necessary since the standby buses are required to be energized from a LCT by several Required Actions of Specification 3.8.1 and the breakers must remain closed to energize the standby buses from a LCT.

SR 3.8.1.6

Infrequently used source breakers are cycled to ensure OPERABILITY. The Standby breakers are to be cycled one breaker at a time to prevent inadvertent interconnection of two units through the standby bus breakers. Cycling the startup breakers verifies OPERABILITY of the breakers and associated interlock circuitry between the normal and

BASES

SURVEILLANCE
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SR 3.8.1.14 (continued)

The SR is modified by a Note indicating that the SR is not required for an SL breaker when its standby bus is energized by a LCT via an isolated power path. This is necessary since the standby buses are required to be energized from a LCT by several Required Actions of Specification 3.8.1 and the breakers must remain closed to energize the standby buses from a LCT.

SR 3.8.1.15

This surveillance verifies proper operation of the 230 kV switchyard circuit breakers upon an actual or simulated actuation of the Switchyard Isolation circuitry. This test causes an actual switchyard isolation (by actuation of degraded grid voltage protection) and alignment of KHUs to the overhead and underground emergency power paths. An 18 month Frequency minimizes the impact to the Station and the operating Units which are connected to the 230 kV switchyard. The effect of this SR is not significant because the generator red bus tie breakers and feeders from the Oconee 230 kV switchyard red bus to the system grid remain closed. Either Switchyard Isolation Channel causes full system realignment, which involves a complete switchyard realignment. To avoid excessive switchyard circuit breaker cycling, realignment and KHU emergency start functions, this SR need be performed only once each SR interval.

This SR is modified by a Note. This Note states the redundant breaker trip coils shall be verified on a STAGGERED TEST BASIS. Verifying the trip coils on a STAGGERED TEST BASIS precludes unnecessary breaker operation and minimizes the impact to the Station and the operating Units which are connected to the 230 kV switchyard.

SR 3.8.1.16

This SR verifies by administrative means that one KHU provides an alternate manual AC power source capability by manual or automatic KHU start with manual synchronize, or breaker closure, to energize its non-required emergency power path. That is, when the KHU to the overhead emergency power path is inoperable, the SR verifies by administrative means that the overhead emergency power path is

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REQUIREMENTS

SR 3.8.3.1 (continued)

proper voltage availability on the distribution centers ensures that the required voltage is readily available for isolating transfer diodes connected to these distribution centers. The 7 day Frequency takes into account the redundant capability of the DC electrical power distribution systems, and other indications available in the control room that alert the operator to system malfunctions.

SR 3.8.3.2

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 5).

SR 3.8.3.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance. The presence of physical damage or deterioration does not necessarily represent a failure of this SR, provided an evaluation determines that the physical damage or deterioration does not affect the OPERABILITY of the battery (its ability to perform its design function).

The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 5), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.

SR 3.8.3.4

Visual inspection of inter-cell, inter-rack, inter-tier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The

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Table 3.8.5-1 (continued)

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 4), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limits for specific gravity is the same as the limits specified for Category A and has been discussed above.

The footnotes to Table 3.8.5-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.5-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery float current is < 2 amps on float charge. This current provides, in general, an indication of overall battery condition.

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 4). Footnote (c) to Table 3.8.5-1 allows the float (charger) current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. When battery float current is verified in lieu of specific gravity, the specific gravity of each connected cell shall be measured prior to expiration of the 7 day allowance. Within 7 days each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than 7 days.

REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.
3. 10 CFR 50.36.
4. IEEE-450-1995.

BASES

LCO
(continued)

Each string is considered OPERABLE if it is energized by at least one main feeder bus except when MCC 1, 2, or 3XSF is powered from load center OXSF. These MCCs would not be available during a DBA when powered from load center OXSF and therefore are considered inoperable.

An OPERABLE 125 VDC Vital I&C Distribution System must include energized 125 VDC Vital I&C panelboards DIA, DIB, DIC, and DID. Additionally, for Units 2 and 3 only, Vital I&C panelboards 1DIC and 1DID shall be energized.

To be considered OPERABLE, 230 kV switchyard 125 VDC panelboards DYA, DYB, DYC, DYE, DYF, and DYG must be energized.

An OPERABLE 120 VAC Vital Instrumentation Distribution System must include energized 120 VAC Vital Instrumentation panelboards KVIA, KVIB, KVIC, and KVID.

These distribution systems ensure the availability of AC, DC, and AC vital electrical power for the systems required to shut down the reactor and maintain it in a safe condition after a transient or accident.

Maintaining the AC, DC, and AC vital electrical power distribution systems OPERABLE ensures that the redundancy incorporated into the design of ES is not defeated. Therefore, a single failure within any system or within the electrical power distribution systems will not prevent safe shutdown of the reactor.

An OPERABLE AC electrical power distribution system requires the associated buses, ES power strings, load centers, and motor control centers to be energized to their proper voltages. OPERABLE 125 VDC Vital I&C panelboards require the panelboards to be energized to their proper voltage from either a battery or charger. OPERABLE 120 VAC Vital Instrumentation panelboards require the panelboards to be energized to their proper voltage from the associated inverter via inverted DC voltage or alternate regulated voltage source.

APPLICABILITY

The electrical power distribution systems are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of accident or transients; and

Attachment 2

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.5.2.3

Periodic surveillance testing of HPI pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems is required by Section XI of the ASME Code (Ref. 5). SRs are specified in the Inservice Testing Program, which encompasses Section XI of the ASME Code.

SR 3.5.2.4 and SR 3.5.2.5

These SRs demonstrate that each automatic HPI valve actuates to the required position on an actual or simulated ESPS signal and that each HPI pump starts on receipt of an actual or simulated ESPS signal. This SR is not required for valves that are locked, sealed, or otherwise secured in position under administrative controls. The test will be considered satisfactory if control board indication verifies that all components have responded to the ESPS actuation signal properly (all appropriate ESPS actuated pump breakers have opened or closed and all ESPS actuated valves have completed their travel). The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. The 18 month Frequency is also acceptable based on consideration of the design reliability (and confirming operating experience) of the equipment. The actuation logic is tested as part of the ESPS testing, and equipment performance is monitored as part of the Inservice Testing Program.

①

SR 3.5.2.6

Periodic inspections of the reactor building sump suction inlet (for LPI-HPI flow path) ensure that it is unrestricted and stays in proper operating condition. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage, on the need to preserve access to the location, and on the potential for an unplanned transient if the Surveillance were performed with the reactor at power. This Frequency has been found to be sufficient to detect abnormal degradation and has been confirmed by operating experience.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.1.2

Maintaining the containment OPERABLE requires compliance with the Type B and C leakage rate test requirements of 10 CFR 50, Appendix J, Option A (Ref. 1), as modified by approved exemptions. As left leakage prior to the first startup after performing a required 10 CFR 50, Appendix J, Option A, leakage test is required to be $< 0.6 L_a$ for combined Type B and C leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0 L_a$. At $\leq 1.0 L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by Appendix J, Option A, as modified by approved exemptions. Thus, SR 3.0.2 (which allows Frequency extensions) does not apply. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.3

This SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are as described in Specification 5.5.7, "Pre-stressed, Containment Tendon Surveillance Program."

Concrete

REFERENCES

1. 10 CFR 50, Appendix J, Option A and B.
 2. UFSAR, Sections 15.13 and 15.14.
 3. UFSAR, Section 6.2.
 4. 10 CFR 50.36.
-

CONTAINMENT

B 3.6 ~~REACTOR BUILDING SYSTEMS~~

B 3.6.2 Containment Air Locks

BASES

BACKGROUND

Containment air locks, also known as the personnel hatch and the emergency hatch, form part of the containment pressure boundary and provide a means for personnel access during all MODES of operation.

Each air lock is nominally a right circular cylinder with a door at each end. The doors are interlocked to prevent simultaneous opening. During periods when containment is not required to be OPERABLE, the door interlock mechanism may be disabled, allowing both doors of an air lock to remain open for extended periods when frequent containment entry is necessary. Each air lock door has been designed and is tested to certify its ability to withstand a pressure in excess of the maximum expected pressure following an accident in containment. As such, closure of a single door supports containment OPERABILITY. Each of the outer doors contains double gasketed seals and local leakage rate testing capability to ensure pressure integrity. To effect a leak tight seal, the air lock design uses pressure seated doors (i.e., an increase in containment internal pressure results in increased sealing force on each door). Each personnel air lock door is provided with limit switches that provide control room indication of door position.

The containment air locks form part of the containment pressure boundary. As such, air lock integrity and leak tightness are essential for maintaining the containment leakage rate within limit in the event of an accident. Not maintaining air lock integrity or leak tightness may result in a leakage rate in excess of that assumed in the unit safety analysis.

APPLICABLE
SAFETY ANALYSES

The accident that results in a release of radioactive material within containment is a loss of coolant accident (LOCA) (Ref. 2). In the analysis of this accident, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.25% of containment air weight per day (Ref. 3). This leakage rate is defined in 10 CFR 50, Appendix J, Option A and B (Ref. 1), as L_a : the maximum allowable containment leakage rate at the calculated

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.3.2

This SR requires verification that each containment isolation manual and non-automatic power operated valve and blind flange located outside containment and not locked, sealed, or otherwise secured, and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. This SR does not require any testing or valve manipulation. Rather, it involves verification, through a system walkdown, that those containment isolation valves outside containment and capable of being mispositioned are in the correct position. Since verification of valve position for containment isolation valves outside containment is relatively easy, the 31 day Frequency is based on engineering judgment and was chosen to provide added assurance of the correct positions. The SR specifies that containment isolation valves open under administrative controls are not required to meet the SR during the time the valves are open. This SR does not apply to valves that are locked, sealed, or otherwise secured, since these were verified to be in the correct position upon locking, sealing, or securing.

INSERT
B 3.6.3-8A

The Note applies to valves and blind flanges located in high radiation areas and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in the proper position, is low.

SR 3.6.3.3

This SR requires verification that each containment isolation manual and non-automatic power operated valve and blind flange that is located inside containment and not locked, sealed, or otherwise secured, and required to be closed during accident conditions is closed. The SR helps to ensure that post accident leakage of radioactive fluids or gases outside the containment boundary is within design limits. For containment isolation valves inside containment, the Frequency of "prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days" is appropriate, since these containment isolation valves are operated under administrative controls and the probability of their misalignment is low. The SR specifies that containment isolation valves open under administrative controls are not

INSERT B 3.6.3-8A

These administrative controls consist of stationing a dedicated individual at the valve, who is in continuous communication with the control room. The dedicated individual can be responsible for closing more than one valve provided that the valves are all in close vicinity and can be closed in a timely manner.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.3.3 (continued)

INSERT B 3.6.3-9A

required to meet the SR during the time they are open. This SR does not apply to valves that are locked, sealed, or otherwise secured, since these were verified to be in the correct position upon locking, sealing, or securing.

The Note allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the access to these areas is typically restricted during MODES 1, 2, 3, and 4 for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in their proper position, is small.

SR 3.6.3.4

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.

SR 3.6.3.5

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following an accident. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This SR is not required for valves that are locked, sealed, or otherwise secured in position under administrative controls. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a unit outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass this Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

INSERT B 3.6.3-9A

These administrative controls consist of stationing a dedicated individual at the valve, who is in continuous communication with the control room. The dedicated individual can be responsible for closing more than one valve provided that the valves are all in close vicinity and can be closed in a timely manner.

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.7.1.1

This SR verifies the OPERABILITY of the MSRVs by the verification of MSRv lift setpoints in accordance with the Inservice Testing Program. The safety and relief valve tests are performed in accordance with ANSI/ASME OM-1-1987 (Ref. 5) and include the following for MSRVs:

- a. Visual examination;
- b. Seat tightness determination;
- c. Setpoint pressure determination (lift setting);
- d. Compliance with owner's seat tightness criteria; and
- e. Verification of the balancing device integrity on balanced valves.

The ANSI/ASME Standard requires the testing of all valves every 5 years, with a minimum of 20% of the valves tested every 24 months. Reference 4 provides the activities and frequencies necessary to satisfy the requirements.

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSRVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSRVs are not tested at hot conditions, the lift setting pressure must be corrected to ambient conditions of the valve at operating temperature and pressure.

REFERENCES

1. UFSAR, Section 10.3.
2. ASME, Boiler and Pressure Vessel Code, Section III, Article NC-7000, Class 2 Components.
3. UFSAR, Chapter 15.
4. UFSAR, Section ~~10.4.7~~ 10.3.3
5. 10 CFR 50.36.
6. ANSI/ASME OM-1-1987.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.2

This SR verifies that TSV closure time of each TSV is ≤ 15.0 seconds on an actual or simulated actuation signal from Channel B. This Surveillance is normally performed upon returning the unit to operation following a refueling outage.

The Frequency for this SR is 18 months. The 18 month Frequency to demonstrate valve closure time is based on the refueling cycle. Operating experience has shown that these components usually pass the Surveillance when performed at the 18 month Frequency. Therefore, the Frequency is acceptable from a reliability standpoint.

This test is conducted in MODE 3, with the unit at operating temperature and pressure, as discussed in the Reference 5 exercising requirements. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows delaying testing until MODE 3 in order to establish conditions consistent with those under which the acceptance criterion was generated.

REFERENCES

1. UFSAR, Section 10.3.
 2. UFSAR, Section 15.13.
 3. 10 CFR 50.36.
 4. 10 CFR 100.11.
-
-

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.10.4 (continued)

designed to maintain a slight negative pressure in the penetration rooms with respect to outside atmosphere to prevent unfiltered LEAKAGE. The PRVS is designed to maintain this negative pressure at a flow rate of $1000 \pm 10\%$ cfm from the area. The Frequency of 18 months on a STAGGERED TEST BASIS is consistent with industry practice and other filtration SRs.

SR 3.7.10.5

Operating the PRVS filter bypass valve is necessary to ensure that the system functions properly. The OPERABILITY of the PRVS filter bypass valve is verified if it can be opened. An 18 month Frequency is consistent with the guidance in Reference 6.

REFERENCES

1. UFSAR, Section 6.5.1.
2. UFSAR, Section 9.4.7.
3. UFSAR, Section ~~15.4.7~~ ^{15.4.8}
4. 10 CFR 20.
5. 10 CFR 50.36.
6. Regulatory Guide 1.52.
7. 10 CFR 100.

BASES

APPLICABLE SAFETY ANALYSES (continued) 21.34 ft, and a minimum decay time of 72 hours prior to fuel handling, the analysis and test programs demonstrate that the iodine release due to a postulated fuel handling or cask drop accident is adequately captured by the water, and offsite doses are maintained within allowable limits (Ref. 7).

The Spent Fuel Pool water level satisfies Criteria 2 and 3 of 10 CFR 50.36 (Ref. 7).

Criterion

LCO The specified water level preserves the assumptions of the fuel handling and cask drop accident analyses (Ref. 3). As such, it is the minimum required for fuel storage and movement within the Spent Fuel Pool or movement of the cask over the Spent Fuel Pool.

APPLICABILITY This LCO applies during movement of irradiated fuel assemblies in the Spent Fuel Pool or movement of the cask over the Spent Fuel Pool since the potential for a release of fission products exists.

ACTIONS Required Actions A.1 and A.2 are modified by a Note indicating that LCO 3.0.3 does not apply.

If moving irradiated fuel assemblies or a cask while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies or a cask while in MODES 1, 2, 3, and 4, the fuel or cask movement is independent of reactor operations. Therefore, in either case, inability to suspend movement of irradiated fuel assemblies or a cask is not sufficient reason to require a reactor shutdown.

A.1

When the initial conditions for an accident cannot be met, immediate action must be taken to preclude the occurrence of an accident. With the Spent Fuel Pool at less than the required level, the movement of fuel assemblies in the Spent Fuel Pool is immediately suspended. This effectively precludes the occurrence of a fuel handling accident. In such a case, unit procedures control the movement of other (non cask) loads over the spent fuel. This does not preclude movement of a fuel assembly to a safe position.

BASES (continued)

APPLICABILITY This LCO applies whenever fuel assemblies are stored in the spent fuel pool.

ACTIONS

~~A.1~~ A.2 and

The Required Actions are modified by a Note indicating that LCO 3.0.3 does not apply.

If moving irradiated fuel assemblies while in MODE 5 or 6, LCO 3.0.3 would not specify any action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operation. Therefore, inability to suspend movement of fuel assemblies is not a sufficient reason to require a reactor shutdown.

When the concentration of boron in the fuel storage pool is less than required, immediate action must be taken to preclude the occurrence of an accident or to mitigate the consequences of an accident in progress. This is achieved by immediately suspending the movement of the fuel assemblies. This does not preclude movement of a fuel assembly to a safe position. Immediate action is also required to initiate action to restore the SFP boron concentration to within limits.

SURVEILLANCE
REQUIREMENTS

SR 3.7.12.1

This SR verifies that the concentration of boron in the fuel storage pool is within the required limit. As long as this SR is met, the analyzed incidents are fully addressed. The 31 day Frequency is appropriate because no major replenishment of pool water is expected to take place over a short period of time and verification is required after each makeup to the SFP. The verification after each makeup should be completed within 12 hours after a 24 hour recirculation period to allow for mixing. This Completion Time is appropriate since no major replenishment of pool water is expected to take place over this period.

REFERENCES

1. ANSI N-16.1-1975.
 2. Letter from B.K. Grimes (USNRC) to Power Reactor Licensees dated April 14, 1978.
 3. 10 CFR 50.36.
-

BASES (continued)

ACTIONS

A.1

With one CRVS train inoperable for the control area, action must be taken to restore the CRVS train to OPERABLE status within 30 days. In this Condition, the remaining OPERABLE CRVS train is adequate to maintain the control area temperature within limits. However, the overall reliability is reduced because a failure in the OPERABLE CRVS train could result in a loss of CRVS cooling function. The 30 day Completion Time is based on the low probability of a loss of CRVS cooling component and the time necessary to perform repairs to CRVS cooling equipment.

B.1

With one WC train inoperable for a control area portion, action must be taken to restore the WC train to OPERABLE status within 30 days. In this Condition, the remaining OPERABLE WC train is adequate to maintain the control area portion temperature within limits. However, the overall reliability is reduced because a failure in the OPERABLE WC train could result in a loss of CRACS cooling function. The 30 day Completion Time is based on the low probability of a loss of WC cooling component, and on the time necessary to perform repairs to WC cooling equipment.

C.1

With the control room area air temperature outside its limit, action must be taken to restore the air temperature to within the limit within 7 days. If the control room area air temperature exceeds its limit, the ability of a single train of CRACS to maintain control room area temperature may be affected. The completion time of 7 days is reasonable considering the remaining CRACS train available to perform the required temperature control function and the low probability of an event occurring that would require the CRACS operation during that time.

The Required Actions are modified by a Note that states LCO 3.0.4 is not applicable. In consideration of the redundant CRACS train available, the small variation in temperature expected between 12 hour surveillances, and the marginal impact small temperature variations may have on the ability of a CRACS train to maintain the control room temperature within limits, an exception to LCO 3.0.4 is applicable for this condition.

BASES

ACTIONS C.1, C.2.1, C.2.2.1, C.2.2.2, C.2.2.3, C.2.2.4, and C.2.2.5 (continued)

LCO 3.3.17, "EPSL Automatic Transfer Function;"

LCO 3.3.18, "EPSL Voltage Sensing Circuits;"

LCO 3.3.19, "EPSL 230 kV Switchyard DGVP;" and

LCO 3.3.21, "EPSL Keowee Emergency Start Function."

This increases the probability, even in the unlikely event of an additional failure, that the DC power system and the 120 VAC Vital Instrumentation power panelboards will function as required to support EPSL, power will not be lost to ES equipment, and EPSL will function as required.

Verifying by administrative means allows a check of logs or other information to determine the OPERABILITY status of required equipment in place of requiring unique performance of Surveillance Requirements. If the AC Source is subsequently determined inoperable, or an LCO stated in Required Action C.2.2.3 (is subsequently determined not met) is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

Required Action C.2.2.4 requires verifying alternate power source capability by performing SR 3.8.1.16. This confirms that entry into Condition C is due only to an inoperable main step-up transformer or an inoperable KHU, as applicable. If SR 3.8.1.16 is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

D.1, D.2 and D.3

With the KHU or its required underground emergency power path inoperable, sufficient AC power sources remain available to ensure safe shutdown of the unit in the event of a transient or accident. Operation may continue for 72 hours if the remaining KHU and its required overhead emergency power path are tested using SR 3.8.1.4 within one hour if not performed in the previous 12 hours. SR 3.8.1.4 is only required to be performed when the KHU associated with the overhead emergency power path is OPERABLE. This Required Action provides assurance that no undetected failures have occurred in the overhead emergency power path. Since Required Action D.1 only specifies

[add 2 spaces]

BASES

ACTIONS

H.1 and H.2 (continued)

This increases the probability, even in the unlikely event of an additional failure, that the DC power system and the 120 VAC Vital Instrumentation power panelboards will function as required to support EPSL, power will not be lost to ES equipment, and EPSL will function as required.

Verifying by administrative means allows a check of logs or other information to determine the OPERABILITY status of required equipment in place of requiring unique performance of Surveillance Requirements. If the AC Source is subsequently determined inoperable, or an LCO stated in the Note to Condition H is subsequently determined not met, continued operation up to a maximum of four hours is allowed by ACTION L.

With both standby buses energized from an LCT via an isolated power path (100 kV transmission circuit electrically separated from the system grid and all offsite loads), a high degree of reliability for the emergency power system is provided. In this configuration, the LCT is serving as a second emergency power source, however, since the Oconee Units are vulnerable to a single failure of the 100 kV transmission circuit a time limit of 60 ~~days~~ is imposed. Required Action H.1 permits the standby buses to be re-energized by an LCT within 1 hour in the event this source is subsequently lost.

hours

If both emergency power paths are restored, unrestricted operation may continue. If only one power path is restored, operation may continue per ACTIONS C or D.

I.1, I.2, and I.3

With both KHUs or their required emergency power paths inoperable for reasons other than Conditions G and H, insufficient standby AC power sources are available to supply the minimum required ES functions. In this Condition, the offsite power system is the only source of AC power available for this level of degradation. The risk associated with continued operation for one hour without an emergency power source is considered acceptable due to the low likelihood of a LOOP during this time period, and because of the potential for grid instability caused by the simultaneous shutdown of all three units. This instability would increase the probability of a total loss of AC power. Operation with both KHUs or their required power paths inoperable is permitted for 12 hours provided

BASES

ACTIONS
(continued)

L.1, L.2, and L.3

With an AC Source inoperable or LCO not met, as stated in Note for Condition H entry; or with an AC Source inoperable or LCO not met, as stated in Required Action C.2.2.3 when in ~~C~~ Condition C for > 72 hours; or with an AC Source inoperable or LCO not met, as stated in Required Action I.2 or J.2 when in Conditions I or J for > 1 hour; or with SR 3.8.1.16 not met, Required Action L.1, L.2 and L.3 requires restoration within four hours. Condition L is modified by a Note indicating that separate Condition entry is permitted for each inoperable AC Source, and LCO or SR not met. The Required Action is modified by a Note that allows the remaining OPERABLE KHU and its required emergency power path to be made inoperable for up to 12 hours if required to restore both KHUs and their required emergency power paths to OPERABLE status. This note is necessary since certain actions such as dewatering the penstock may be necessary to restore the inoperable KHU although these actions would also cause both KHUs to be inoperable.

The purpose of this Required Action is to restrict the allowed outage time for an inoperable AC Source or equipment required by an LCO when in Conditions C, H, I or J. For Conditions I and J when the LCOs stated are initially not met, the maximum Completion Time is four hours or the remaining Completion Time allowed by the stated LCO, whichever is shorter.

M.1 and M.2

If a Required Action and associated Completion Time for Condition C, F, G, H, I, J, K or L are not met; or if a Required Action and associated Completion Time are not met for Required Action D.1 or D.3, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 12 hours and to MODE 5 within 84 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.4 (continued)

after removing the KHU from the overhead emergency power path. This surveillance can be satisfied by first demonstrating the ability of the KHU associated with the underground emergency path to energize the underground path then synchronizing the KHU to the overhead emergency power path. The SR is modified by a Note indicating that the requirement to energize the underground emergency power path is not applicable when the overhead disconnects are open for the KHU associated with the underground emergency power path or 2) when complying with Required Action D.1. The latter exception is necessary since Required Action D.1 continues to be applicable when both KHUs are inoperable.

The 31 day Frequency for this Surveillance was determined to be adequate based on operating experience to provide reliability verification without excessive equipment cycling for testing.

SR 3.8.1.5

This surveillance verifies OPERABILITY of the trip functions of each closed SL and each closed N breaker. Neither of these breakers have any automatic close functions; therefore, only the trip coils require verification. Cycling of each breaker demonstrates functional OPERABILITY and the coil monitor circuits verify the integrity of each trip coil. The 31 day frequency is based on operating experience.

This SR modified by a Note that states it is not required to be performed for an SL breaker when its standby bus is energized from a LCT via an isolated power path. This is necessary since the standby buses are required to be energized from a LCT by several Required Actions of Specification 3.8.1 and the breakers must remain closed to energize the standby buses from a LCT.

SR 3.8.1.6

Infrequently used source breakers are cycled to ensure OPERABILITY. The Standby breakers are to be cycled one breaker at a time to prevent inadvertent interconnection of two units through the standby bus breakers. Cycling the startup breakers verifies OPERABILITY of the breakers and associated interlock circuitry between the normal and

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.1.14 (continued)

The SR is modified by a Note indicating that the SR is not required for an SL breaker when its standby bus is energized by a LCT via an isolated power path. This is necessary since the standby buses are required to be energized from a LCT by several Required Actions of Specification 3.8.1 and the breakers must remain closed to energize the standby buses from a LCT.

SR 3.8.1.15

This surveillance verifies proper operation of the 230 kV switchyard circuit breakers upon an actual or simulated actuation of the Switchyard Isolation circuitry. This test causes an actual switchyard isolation (by actuation of degraded grid voltage protection) and alignment of KHUs to the overhead and underground emergency power paths. An 18 month Frequency minimizes the impact to the Station and the operating Units which are connected to the 230 kV switchyard. The effect of this SR is not significant because the generator red bus tie breakers and feeders from the Oconee 230 kV switchyard red bus to the system grid remain closed. Either Switchyard Isolation Channel causes full system realignment, which involves a complete switchyard realignment. To avoid excessive switchyard circuit breaker cycling, realignment and KHU emergency start functions, this SR need be performed only once each SR interval.

This SR is modified by a Note. This Note states the redundant breaker trip coils shall be verified on a STAGGERED TEST BASIS. Verifying the trip coils on a STAGGERED TEST BASIS precludes unnecessary breaker operation and minimizes the impact to the Station and the operating Units which are connected to the 230 kV switchyard.

SR 3.8.1.16

This SR verifies by administrative means that one KHU provides an alternate manual AC power source capability by manual or automatic KHU start with manual synchronize, or breaker closure, to energize its non-required emergency power path. That is, when the KHU to the overhead emergency power path is inoperable, the SR verifies by administrative means that the overhead emergency power path is

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.8.3.1 (continued)

proper voltage availability on the distribution centers ensures that the required voltage is readily available for isolating transfer diodes connected to these distribution centers. The 7 day Frequency takes into account the redundant capability of the DC electrical power distribution systems, and other indications available in the control room that alert the operator to system malfunctions.

SR 3.8.3.2

Verifying battery terminal voltage while on float charge for the batteries helps to ensure the effectiveness of the charging system and the ability of the batteries to perform their intended function. Float charge is the condition in which the charger is supplying the continuous charge required to overcome the internal losses of a battery (or battery cell) and maintain the battery (or a battery cell) in a fully charged state. The voltage requirements are based on the nominal design voltage of the battery and are consistent with the initial voltages assumed in the battery sizing calculations. The 7 day Frequency is consistent with manufacturer recommendations and IEEE-450 (Ref. 5).

SR 3.8.3.3

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance. The presence of physical damage or deterioration does not necessarily represent a failure of this SR, provided an evaluation determines that the physical damage or deterioration does not affect the OPERABILITY of the battery (its ability to perform its design function).

The 12 month Frequency for this SR is consistent with IEEE-450 (Ref. 5), which recommends detailed visual inspection of cell condition and rack integrity on a yearly basis.

SR 3.8.3.4

Visual inspection of inter-cell, inter-rack, inter-tier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate graded battery condition. The

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BASES

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Table 3.8.5-1 (continued)

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 4), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limits ~~of~~ for specific gravity is the same as the limits specified for Category A and has been discussed above.

The footnotes to Table 3.8.5-1 are applicable to Category A, B, and C specific gravity. Footnote (b) to Table 3.8.5-1 requires the above mentioned correction for electrolyte level and temperature, with the exception that level correction is not required when battery float current is < 2 amps on float charge. This current provides, in general, an indication of overall battery condition.

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 4). Footnote (c) to Table 3.8.5-1 allows the float (charger) current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. When battery float current is verified in lieu of specific gravity, the specific gravity of each connected cell shall be measured prior to expiration of the 7 day allowance. Within 7 days each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less ~~than~~ 7 days. *than*

REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 15.
3. 10 CFR 50.36.
4. IEEE-450-1995.

BASES

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(continued)

Each string is considered OPERABLE if it is energized by at least one main feeder bus except when MCC 1, 2, or 3XSF is powered from load center OXSF. These MCCs would not be available during a DBA when powered from load center OXSF and ~~are~~ therefore are considered inoperable.

An OPERABLE 125 VDC Vital I&C Distribution System must include energized 125 VDC Vital I&C panelboards DIA, DIB, DIC, and ~~DIB~~. Additionally, for Units 2 and 3 only, Vital I&C panelboards 1DIC and 1DID shall be energized.

To be considered OPERABLE, 230 kV switchyard 125 VDC panelboards DYA, DYB, DYC, DYE, DYF, and DYG must be energized.

An OPERABLE 120 VAC Vital Instrumentation Distribution System must include energized 120 VAC Vital Instrumentation panelboards KVIA, KVIB, KVIC, and KVID.

These distribution systems ensure the availability of AC, DC, and AC vital electrical power for the systems required to shut down the reactor and maintain it in a safe condition after a transient or accident.

Maintaining the AC, DC, and AC vital electrical power distribution systems OPERABLE ensures that the redundancy incorporated into the design of ES is not defeated. Therefore, a single failure within any system or within the electrical power distribution systems will not prevent safe shutdown of the reactor.

An OPERABLE AC electrical power distribution system requires the associated buses, ES power strings, load centers, and motor control centers to be energized to their proper voltages. OPERABLE 125 VDC Vital I&C panelboards require the panelboards to be energized to their proper voltage from either a battery or charger. OPERABLE 120 VAC Vital Instrumentation panelboards require the panelboards to be energized to their proper voltage from the associated inverter via inverted DC voltage or alternate regulated voltage source.

APPLICABILITY

The electrical power distribution systems are required to be OPERABLE in MODES 1, 2, 3, and 4 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of accident or transients; and