B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.1 SHUTDOWN MARGIN (SDM)

BASES

BACKGROUND

According to GDC 26 (Ref. 1) the reactivity control systems must be redundant and capable of holding the reactor core subcritical when shutdown under cold conditions. Maintenance of the SDM ensures that postulated reactivity events will not damage the fuel.

SDM requirements provide sufficient reactivity margin to assure that acceptable fuel design limits will not be exceeded for normal shutdown and anticipated operational occurrences (AOOs). As such, the SDM defines the degree of subcriticality that would be obtained immediately following the insertion or scram of all shutdown and control rods, assuming that the single rod cluster assembly of highest reactivity worth is fully withdrawn.

The system design requires that two independent reactivity control systems be provided, and that one of these systems be capable of maintaining the core subcritical under cold conditions. These requirements are provided by the use of movable control assemblies and soluble boric acid in the Reactor Coolant System (RCS). The Plant Control System (PLS) can compensate for the reactivity effects of the fuel and water temperature changes accompanying power level changes over the range from full load to no load. In addition, the PLS, together with the boration system, provides the SDM during power operation and is capable of making the core subcritical rapidly enough to prevent exceeding acceptable fuel damage limits, assuming that the rod of highest reactivity worth remains fully withdrawn. The soluble boron system can compensate for fuel depletion during operation and xenon burnout reactivity changes and maintain the reactor subcritical under cold conditions.

During power operation, SDM control is ensured by operating with the shutdown banks fully withdrawn and the control banks within the limits of LCO 3.1.6, "Control Bank Insertion Limits." When the unit is in the shutdown and refueling modes, the SDM requirements are met by adjustments to the RCS boron concentration.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The minimum required SDM is assumed as an initial condition in safety analyses. The safety analyses (Ref. 2) establish an SDM that ensures that specified acceptable fuel design limits are not exceeded for normal operation including AOOs and Design Basis Accidents (DBAs) with the assumption of the highest worth rod stuck out on scram.

The acceptance criteria for the SDM requirements are that specified acceptable fuel design limits are maintained. This is done by ensuring that:

a. The reactor can be made subcritical from all operating conditions, transients, and DBAs;

b. The reactivity transients associated with postulated accident conditions are controllable within acceptable limits (departures from nucleate boiling ratio (DNBR), fuel centerline temperature limits for AOOs, and radial average fuel enthalpy limits for the rod ejection accident); and

c. The reactor will be maintained sufficiently subcritical to preclude inadvertent criticality in the shutdown condition.

The most limiting accidents for the SDM requirements are based on a main steam line break (SLB) and inadvertent opening of a steam generator (SG) relief or safety valve, as described in the accident analyses (Ref. 2). The increased steam flow in the main steam system causes an increased energy removal from the affected SG, and consequently the RCS. This results in a reduction of the reactor coolant temperature. The resultant coolant shrinkage causes a reduction in pressure. In the presence of a negative moderator temperature coefficient (MTC), this cooldown causes an increase in core reactivity. The positive reactivity addition from the moderator temperature decrease will terminate when the affected SG boils dry, thus terminating RCS heat removal and cooldown. Following the SLB or opening of an SG relief or safety valve, a post trip return to power may occur; however, no fuel damage occurs as a result of the post trip return to power, and the THERMAL POWER does not violate the Safety Limit (SL) requirement of SL 2.1.1.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

In addition to the limiting SLB and inadvertent opening of an SG relief or safety valve transients, the SDM requirement must also protect against:

a. Inadvertent boron dilution;

b. An uncontrolled rod withdrawal from subcritical or low power condition;

c. Rod ejection;

d. Inadvertent operation of Passive Residual Heat Removal Heat Exchanger (PRHR HX).

Each of these events is discussed below.

In the boron dilution analysis, the required SDM defines the reactivity difference between an initial subcritical boron concentration and the corresponding critical boron concentration. These values, in conjunction with the configuration of the RCS and the assumed dilution flow rate, directly affect the results of the analysis. This event is most limiting when critical boron concentrations are highest.

The uncontrolled rod withdrawal transient is terminated by a high neutron flux trip. Power level, RCS pressure, linear heat rate, and the DNBR do not exceed allowable limits.

The ejection of a control rod rapidly adds reactivity to the reactor core, causing both the core power level and heat flux to increase with corresponding increases in reactor coolant temperatures and pressure. The ejection of a rod also produces a time-dependent redistribution of core power.

The inadvertent actuation of the PRHR HX causes an RCS temperature reduction from an initial injection of relatively cold water and the continued cooling of the RCS by PRHR. In the presence of a negative moderator temperature coefficient, the RCS temperature reduction causes an increase in core reactivity. Safety injection on the low cold leg temperature or low pressurizer pressure signals actuate the core makeup tank (CMT) and bring the plant to a stable condition.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

SDM satisfies Criterion 2 of the NRC Policy Statement. Even though it is not directly observed from the main control room, SDM is considered an initial condition process variable because it is periodically monitored to provide assurance that the unit is operating within the bounds of accident analysis assumptions.

LCO

SDM is a core design condition that can be ensured during operation through control rod positioning (control and shutdown banks) and through the soluble boron concentration.

The SLB and the boron dilution accidents (Ref. 2) are the most limiting analyses that establish the SDM value of the LCO. For SLB accidents, if the LCO is violated, there is a potential to exceed the DNBR limit and to exceed 10 CFR 50.34 limits (Ref. 3). For the boron dilution accident, if the LCO is violated, the minimum required time assumed for automatic action to terminate dilution may no longer be applicable.

APPLICABILITY

In MODE 2 with $k_{eff} < 1.0$, and in MODES 3, 4, and 5, the SDM requirements are applicable to provide sufficient negative reactivity to meet the assumptions of the safety analyses discussed above. In MODE 6, the shutdown reactivity requirements are given in LCO 3.9.1, "Boron Concentration." In MODES 1 and 2, with $k_{eff} \geq 1.0$, SDM is ensured by complying with LCO 3.1.5, "Shutdown Bank Insertion Limits and LCO 3.1.6, "Control Bank Insertion Limits."

ACTIONS

A.1

If the SDM requirements are not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. It is assumed that boration will be continued until the SDM requirements are met.

(continued)

BASES

ACTIONS

A.1 (continued)

In the determination of the required combination of boration flow rate and boron concentration, there is no unique requirement that must be satisfied. Since it is imperative to raise the boron concentration of the RCS as soon as possible, the boron concentration should be a concentrated solution. The operator should begin boration with the best source available for the plant conditions.

In determining the boration flow rate, the time in core life must be considered. For instance, the most difficult time in core life to increase the RCS boron concentration is at the beginning of cycle when the boron concentration may exceed 2000 ppm.

SURVEILLANCE REQUIREMENTS

SR 3.1.1.1

In MODES 1 and 2, SDM is verified by observing that the requirements of LCO 3.1.5 and LCO 3.1.6 are met. In the event that a rod is known to be untrippable, however, SDM verification must account for the worth of the untrippable rod as well as another rod of maximum worth.

In MODES 3, 4, and 5, the SDM is verified by performing a reactivity balance calculation, considering the listed reactivity effects:

a. RCS boron concentration;

b. Control bank position;

c. RCS average temperature;

d. Fuel burnup based on gross thermal energy generation;

e. Xenon concentration;

f. Samarium concentration; and

g. Isothermal Temperature Coefficient (ITC).

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.1.1 (continued)

Using the ITC accounts for Doppler reactivity in this calculation because the reactor is subcritical and the fuel temperature will be changing at the same rate as the RCS.

The Frequency of 24 hours is based on the generally slow change in required boron concentration and the low probability of an accident occurring without the required SDM. This allows time for the operator to collect the required data, which includes performing a boron concentration analysis, and complete the calculation.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26.
2. Chapter 15, "Accident Analysis."
3. 10 CFR 50.34.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.2 Core Reactivity

BASES

BACKGROUND

According to GDC 26, GDC 28, and GDC 29 (Ref. 1), reactivity shall be controllable, such that subcriticality is maintained under cold conditions, and acceptable fuel design limits are not exceeded during normal operation and anticipated operational occurrences. Therefore, reactivity balance is used as a measure of the predicted versus measured core reactivity during power operation. The periodic confirmation of core reactivity is necessary to ensure that Design Basis Accident (DBA) and transient safety analyses remain valid. A large reactivity difference could be the result of unanticipated changes in fuel, control rod worth, or operation at conditions not consistent with those assumed in the predictions of core reactivity and could potentially result in a loss of SDM or violation of acceptable fuel design limits. Comparing predicted versus measured core reactivity validates the nuclear methods used in the safety analysis and supports the SDM demonstrations (LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") in ensuring the reactor can be brought safely to cold, subcritical conditions.

When the reactor core is critical or in normal power operation, a reactivity balance exists and the net reactivity is zero. A comparison of predicted and measured reactivity is convenient under such a balance since parameters are being maintained relatively stable under steady-state power conditions. The positive reactivity inherent in the core design is balanced by the negative reactivity of the control components, thermal feedback, neutron leakage, and materials in the core that absorb neutrons, such as burnable absorbers producing zero net reactivity. Excess reactivity can be inferred from the boron letdown curve (or critical boron curve), which provides an indication of the soluble boron concentration in the Reactor Coolant System (RCS) versus cycle burnup. Periodic measurement of the RCS boron concentration for comparison with the predicted value with other variables fixed (such as rod height, temperature, pressure, and power), provides a convenient method of ensuring that core reactivity is within design expectations and that the calculation models used to generate the safety analysis are adequate.

(continued)

BASES

BACKGROUND (continued)

In order to achieve the required fuel cycle energy output, the uranium enrichment, in the new fuel loading and in the fuel remaining from the previous cycle, provides excess positive reactivity beyond that required to sustain steady state operation throughout the cycle. When the reactor is critical at RTP and a negative moderator temperature coefficient, the excess positive reactivity is compensated by burnable absorbers (if any), control rods, whatever neutron poisons (mainly xenon and samarium) are present in the fuel, and the RCS boron concentration.

When the core is producing THERMAL POWER, the fuel is being depleted and excess reactivity is decreasing. As the fuel depletes, the RCS boron concentration is reduced to compensate reactivity and maintain constant THERMAL POWER. The boron letdown curve is based on steady state operation at RTP. Therefore, deviations from the predicted boron letdown curve may indicate deficiencies in the design analysis, deficiencies in the calculational models, or abnormal core conditions, and must be evaluated.

APPLICABLE SAFETY ANALYSES

The acceptance criteria for core reactivity are that the reactivity balance limit ensures plant operation is maintained within the assumptions of the safety analyses.

Accurate prediction of core reactivity is either an explicit or implicit assumption in the accident analysis evaluations. Certain accident evaluations (Ref. 2) are, therefore, dependent upon accurate evaluation of core reactivity. In particular, SDM and reactivity transients, such as control rod withdrawal accidents or rod ejection accidents, are sensitive to accurate predictions of core reactivity. These accident analysis evaluations rely on computer codes that have been qualified against available test data, operating plant data, and analytical benchmarks. Monitoring reactivity balance provides additional assurance that the nuclear methods provide an accurate representation of the core reactivity.

Design calculations and safety analysis are performed for each fuel cycle for the purpose of predetermining reactivity behavior and the RCS boron concentration requirements for reactivity control during fuel depletion.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The comparison between measured and predicted initial core reactivity provides a normalization for the calculational models used to predict core reactivity. If the measured and predicted RCS boron concentrations for identical core conditions at beginning of cycle (BOC) do not agree, then the assumptions used in the reload cycle design analysis or the calculation models used to predict soluble boron requirements may not be accurate. If reasonable agreement between measured and predicted core reactivity exists at BOC, then the prediction may be normalized to the measured boron concentration. Thereafter, any significant deviations in the measured boron concentration from the predicted boron letdown curve that develop during fuel depletion may be an indication that the calculational model is not adequate for core burnups beyond BOC, or that an unexpected change in core conditions has occurred.

The normalization of predicted RCS boron concentration to the measured value is typically performed after reaching RTP following startup from a refueling outage, with the control rods in their normal positions for power operation. The normalization is performed at BOC conditions so that core reactivity relative to predicted values can be continually monitored and evaluated as core conditions change during the cycle.

Core reactivity satisfies Criterion 2 of the NRC Policy Statement.

LCO

Long term core reactivity behavior is a result of the core physics design and cannot be easily controlled once the core design is fixed. During operation, therefore, the Conditions of the LCO can only be ensured through measurement and tracking, and appropriate actions taken as necessary. Large differences between actual and predicted core reactivity may indicate that the assumptions of the DBA and transient analyses are no longer valid, or that the uncertainties in the Nuclear Design Methodology are larger than expected. A limit on the reactivity balance of $\pm$ 1% $\Delta k/k$ has been established based on engineering judgment. A 1% deviation in reactivity from that predicted is larger than expected for normal operation and should therefore be evaluated.

(continued)

BASES

LCO (continued)

When measured core reactivity is within 1% Δk/k of the predicted value at steady state thermal conditions, the core is considered to be operating within acceptable design limits. Since deviations from the limit are normally detected by comparing predicted and measured steady state RCS critical boron concentrations, the difference between measured and predicted values would be approximately 100 ppm (depending on the boron worth) before the limit is reached. These values are well within the uncertainty limits for analysis of boron concentration samples, so that spurious violations of the limit due to uncertainty in measuring the RCS boron concentration are unlikely.

APPLICABILITY

The limits on core reactivity must be maintained during MODES 1 and 2 because a reactivity balance must exist when the reactor is critical or producing THERMAL POWER. As the fuel depletes, core conditions are changing, and confirmation of the reactivity balance ensures the core is operating as designed. This specification does not apply in MODE 3, 4, and 5 because the reactor is shutdown and the reactivity balance is not changing.

In MODE 6, fuel loading results in a continually changing core reactivity. Boron concentration requirements (LCO 3.9.1, "Boron Concentration") ensure that fuel movements are performed within the bounds of the safety analysis. An SDM demonstration is required during the first startup following operations that could have altered core reactivity (e.g., fuel movement, control rod replacement, control rod shuffling).

ACTIONS

A.1 and A.2

Should an anomaly develop between measured and predicted core reactivity, an evaluation of the core design and safety analysis must be performed. Core conditions are evaluated to determine their consistency with input to design calculations. Measured core and process parameters are evaluated to determine that they are within the bounds of the safety analysis, and safety analysis calculational models are reviewed to verify that they are adequate for representation of the core conditions. The required Completion Time of 72 hours is

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

based on the low probability of a DBA occurring during this period and allows sufficient time to assess the physical condition of the reactor and complete the evaluation of the core design and safety analysis.

Following evaluations of the core design and safety analysis, the cause of the reactivity anomaly may be resolved. If the cause of the reactivity anomaly is a mismatch in core conditions at the time of RCS boron concentration sampling, then a recalculation of the RCS boron concentration requirements may be performed to demonstrate that core reactivity is behaving as expected. If an unexpected physical change in the condition of the core has occurred, it must be evaluated and corrected, if possible. If the cause of the reactivity anomaly is in the calculation technique, then the calculational models must be revised to provide more accurate predictions. If any of these results are demonstrated and it is concluded that the reactor core is acceptable for continued operation, then the boron letdown curve may be renormalized and power operation may continue. If operational restriction or additional SRs are necessary to ensure the reactor core is acceptable for continued operation, then they must be defined.

The required Completion Time of 72 hours is adequate for preparing whatever operating restrictions or Surveillances that may be required to allow continued reactor operation.

B.1

If the core reactivity cannot be restored to within the 1% $\Delta k/k$ limit, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. If the SDM for MODE 3 is not met, then the boration required by SR 3.1.1.1 would occur. The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.1.2.1

Core reactivity is verified by periodic comparisons of measured and predicted RCS boron concentrations. The comparison is made considering that other core conditions are fixed or stable, including control rod position, moderator temperature, fuel temperature, fuel depletion, xenon concentration, and samarium concentration. The Surveillance is performed prior to entering MODE 1 as an initial check on core conditions and design calculations at BOC. A Note is included in the SR to indicate that the normalization of predicted core reactivity to the measured value must take place within the first 60 effective full power days (EFPDs) after each fuel loading. This allows sufficient time for core conditions to reach steady state, but prevents operation for a large fraction of the fuel cycle without establishing a benchmark for the design calculations. The required subsequent Frequency of 31 EFPDs after the initial 60 EFPDs after entering MODE 1 is acceptable based on the slow rate of core changes due to fuel depletion and the presence of other indicators (QPTR, AFD, etc.) for prompt indication of an anomaly.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 26, GDC 28, and GDC 29.

2. Chapter 15, "Accident Analysis."

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.3 Moderator Temperature Coefficient (MTC)

BASES

BACKGROUND

According to GDC 11 (Ref. 1), the reactor core and its interaction with the Reactor Coolant System (RCS) must be designed for inherently stable power operation even in the possible event of an accident. In particular, the net reactivity feedback in the system must compensate for any unintended reactivity increases.

The MTC relates a change in core reactivity to a change in reactor coolant temperature (a positive MTC means that reactivity increases with increasing moderator temperature; conversely, a negative MTC means that reactivity decreases with increasing moderator temperature). The reactor is designed to operate with a non-positive MTC over the range of fuel cycle operation. Therefore, a coolant temperature increase will cause a reactivity decrease, so that the coolant temperature tends to return toward its initial value. Reactivity increases that cause a coolant temperature increase will thus be self limiting, and stable power operation will result.

MTC values are predicted at selected burnups during the safety evaluation analysis and are confirmed to be acceptable by measurements. Both initial and reload cores are designed so that the MTC is less than zero when THERMAL POWER is at RTP. The actual value of the MTC is dependent on core characteristics such as fuel loading and reactor coolant soluble boron concentration. The core design may require additional fixed distributed poisons (burnable absorbers) to yield an MTC within the range analyzed in the plant accident analysis. The end of cycle (EOC) MTC is also limited by the requirements of the accident analysis. Fuel cycles designed to achieve high burnups that have changes to other characteristics are evaluated to ensure that the MTC does not exceed the EOC limit.

The limitations on MTC are provided to ensure that the value of this coefficient remains within the limiting conditions assumed in the Chapter 15 accident and transient analyses (Ref. 2).

(continued)

BASES

BACKGROUND (continued)

If the LCO limits are not met, the plant response during transients may not be as predicted. The core could violate criteria that prohibit a return to criticality, or the departure from nucleate boiling ratio criteria of the approved correlation may be violated, which could lead to a loss of the fuel cladding integrity.

The SRs for measurement of the MTC at the beginning and near the end of the fuel cycle are adequate to confirm that the MTC remains within its limits since this coefficient changes slowly due principally to the RCS boron concentration associated with fuel burnup and burnable absorbers.

APPLICABLE SAFETY ANALYSES

The acceptance criteria for the specified MTC are:

a. The MTC values must remain within the bounds of those used in the accident analysis (Ref. 2); and

b. The MTC must be such that inherently stable power operations result during normal operation and accidents, such as overheating and overcooling events.

Chapter 15 (Ref. 2) contains analyses of accidents that result in both overheating and overcooling of the reactor core. MTC is one of the controlling parameters for core reactivity in these accidents. Both the least negative value and most negative value of the MTC are important to safety, and both values must be bounded. Values used in the analyses consider worst case conditions to ensure that the accident results are bounding (Ref. 3).

The consequences of accidents that cause core heat-up must be evaluated when the MTC is least negative. Such accidents include the rod withdrawal transient from either zero (Ref. 2) or RTP, loss of main feedwater flow, and loss of forced reactor coolant flow. The consequences of accidents that cause core overcooling must be evaluated when the MTC is negative. Such accidents include sudden feedwater flow increase and sudden decrease in feedwater temperature.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

In order to ensure a bounding accident analysis, the MTC is assumed to be its most limiting value for the analysis conditions appropriate to each accident. The bounding value is determined by considering rodded and unrodded conditions, whether the reactor is at full or zero power, and whether it is BOC or EOC. The most conservative combination appropriate to the accident is then used for the analysis (Ref. 2).

MTC values are bounded in reload safety evaluations assuming steady state conditions at the limiting time in cycle life. An EOC measurement is conducted at conditions when the RCS boron concentration reaches approximately 300 ppm. The measured value may be extrapolated to project the EOC value, in order to confirm reload design predictions.

MTC satisfies Criterion 2 of the NRC Policy Statement. Even though it is not directly observed and controlled from the control room, MTC is considered an initial condition process variable because of its dependence on boron concentration.

LCO

LCO 3.1.3 requires the MTC to be within specified limits of the COLR to ensure that the core operates within the assumptions of the accident analysis. During the reload core safety evaluation, the MTC is analyzed to determine that its values remain within the bounds of the accident analysis during operation.

Assumptions made in safety analyses require that the MTC be more negative than a given upper limit and less negative than a given lower limit. The MTC is least negative near BOC; this upper bound must not be exceeded. This maximum upper limit occurs at all rods out (ARO), hot zero power conditions. At EOC the MTC takes on its most negative value, when the lower bound becomes important. This LCO exists to ensure that both the upper and lower bounds are not exceeded.

During operation, therefore, the conditions of the LCO can only be ensured through measurement. The surveillance checks at BOC and EOC on MTC provide confirmation that the MTC is behaving as anticipated so that the acceptance criteria are met.

(continued)

BASES

LCO (continued)

The BOC limit and the EOC limit are established in the COLR to allow specifying limits for each particular cycle. This permits the unit to take advantage of improved fuel management and changes in unit operating schedule.

APPLICABILITY

Technical Specifications place both LCO and SR values on MTC, based on the safety analysis assumptions described above.

In MODE 1, the limits on MTC must be maintained to assure that any accident initiated from THERMAL POWER operation will not violate the design assumptions of the accident analysis. In MODE 2, with the reactor critical, the upper limit must also be maintained to ensure that startup and subcritical accidents (such as the uncontrolled CONTROL ROD assembly or group withdrawal) will not violate the assumptions of the accident analysis. The lower MTC limit must be maintained in MODES 2 and 3, in addition to MODE 1, to ensure that cooldown accidents will not violate the assumptions of the accident analysis. In MODES 4, 5, and 6, this LCO is not applicable, since no Design Basis Accidents (DBAs) using the MTC as an analysis assumption are initiated from these MODES.

ACTIONS

A.1

If the upper MTC limit is violated, administrative withdrawal limits for control banks must be established to maintain the MTC within its limits. The MTC becomes more negative with control bank insertion and decreased boron concentration. A Completion Time of 24 hours provides enough time for evaluating the MTC measurement and computing the required bank withdrawal limits.

As cycle burnup is increased, the RCS boron concentration will be reduced. The reduced boron concentration causes the MTC to become more negative. Using physics calculations, the time in cycle life at which the calculated MTC will meet the LCO requirement can be determined. At this point in core life, Condition A no longer exists. The unit is no longer in the Required Action, so the administrative withdrawal limits are no longer in effect.

(continued)

BASES

ACTIONS (continued)

B.1

If the required administrative withdrawal limits at BOC are not established within 24 hours, the unit must be placed in MODE 2 with $k_{eff} < 1.0$ to prevent operation with an MTC which is less negative than that assumed in safety analyses.

The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

C.1

Exceeding the EOC MTC limit means that the safety analysis assumptions for the EOC accidents that use a bounding negative MTC value may be invalid. If the EOC MTC limit is exceeded, the plant must be placed in a MODE or Condition in which the LCO requirements are not applicable. This is done by placing the plant in at least MODE 4 within 12 hours.

The allowed Completion Time is a reasonable time based on operating experience to reach the required MODE from full power operation in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.3.1

This SR requires measurement of the MTC at BOC prior to entering MODE 1 in order to demonstrate compliance with the most limiting MTC LCO. Meeting the limit prior to entering MODE 1 assures that the limit will also be met at higher power levels.

The BOC MTC value for ARO will be inferred from isothermal temperature coefficient measurements obtained during the physics tests after refueling. The ARO value can be directly compared to the MTC limit of the LCO. If required, measurement results and predicted design values can be used to establish administrative withdrawal limits for control banks.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.3.2 and SR 3.1.3.3

In similar fashion, the LCO demands that the MTC be less negative than the specified value for EOC full power conditions. This measurement may be performed at any THERMAL POWER, but its results must be extrapolated to the conditions of RTP and all banks withdrawn in order to make a proper comparison with the LCO value. Because the RTP MTC value will gradually become more negative with further core depletion and boron concentration reduction, a 300 ppm SR value of MTC should necessarily be less negative than the EOC LCO limit. The 300 ppm SR value is sufficiently less negative than the EOC LCO limit value to provide assurance that the LCO limit will be met at EOC when the 300 ppm Surveillance criterion is met.

SR 3.1.3.3 is modified by a Note that includes the following requirements:

a. If the 300 ppm Surveillance limit is exceeded, it is possible that the EOC limit on MTC could be reached before the planned EOC. Because the MTC changes slowly with core depletion, the surveillance frequency of 7 effective full power days is sufficient to avoid exceeding the EOC limit.

b. The Surveillance limit for RTP boron concentration of 60 ppm is conservative. If the measured MTC at 60 ppm is more positive than the 60 ppm surveillance limit, the EOC limit will not be exceeded because of the gradual manner in which MTC changes with core burnup.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 11.

2. Chapter 15, "Accident Analysis."

3. WCAP 9273-NP-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.4 Rod Group Alignment Limits

BASES

BACKGROUND

The OPERABILITY (e.g., trippability) of the shutdown and control rods is an initial assumption in all safety analyses which assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the safety analysis that directly affects core power distributions and assumptions of available SDM.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Plants" (Ref. 2).

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. Control rod inoperability or misalignment may cause increased power peaking due to the asymmetric reactivity distribution and a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on control rod alignment have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

Rod cluster control assemblies (RCCAs), or rods, are moved by their control rod drive mechanisms (CRDMs). Each CRDM moves its RCCA one step (approximately 5/8 inch) at a time but at varying rates (steps per minute) depending on the signal output from the Plant Control System (PLS).

The RCCAs are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs consists of two groups that are moved in a staggered fashion, but always within one

(continued)

BASES

BACKGROUND (continued)

step of each other. The AP600 design has five control banks and three shutdown banks.

The shutdown banks are maintained either in the fully inserted or fully withdrawn position. The control banks are part of the MSHIM (Mechanical Shim) Control System which utilizes two independently operable groups of control banks for control of reactivity and axial power distribution.

Certain control rods will be pre-selected for inclusion in the Rapid Power Reduction (RPR) system. The purpose of the RPR is to initiate a rapid decrease in the core power during load rejection transients.

Reactivity control is provided primarily by the M banks. The M Banks consist of several control banks operating with a fixed overlap. The bank worth and overlap are defined so as to minimize the impact on axial offset with control bank maneuvering and still retain the reactivity required to meet the desired load changes.

The axial power distribution control is provided by the AO Bank, a relatively high worth bank.

In order to avoid boron adjustment for load follow operation, gray rods are utilized.

There are 16 gray rod RCCAs in the AP600, each composed of 24 rodlets mounted on a common RCCA spider. These have been subdivided into what has been termed as M0 Bank and the M1 Bank with 8 gray rod RCCAs in each.

The M0 Bank has almost the same worth as the M1 Bank. Its primary function is to provide additional reactivity during the transition periods. During base load operation, the M0 Bank may be fully inserted into the core. The M0 Bank consists of a relatively low worth bank.

The M0 Bank and M1 Bank function together with a zero overlap relationship, and a single variable (i.e., criticality or temperature) drives both groups as if they are in one control group.

The control rods are arranged in a radially symmetric pattern so that control bank motion does not introduce radial asymmetries in the core power distributions.

(continued)

BASES

BACKGROUND (continued)

The axial position of shutdown rods and control rods is indicated by two separate and independent systems, which are the Bank Demand Position Indication System (commonly called group step counters) and the Digital Rod Position Indication (DRPI) System.

The Bank Demand Position Indication System counts the pulses from the rod control system that moves the rods. There is one step counter for each group of rods. Individual rods in a group all receive the same signal to move and should, therefore, all be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise ($\pm$ 1 step or $\pm \frac{5}{8}$ inch). If a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

The DRPI System provides a highly accurate indication of actual control rod position, at a lower precision than the step counters. This system is based on inductive analog signals from a series of coils spaced along a hollow tube with a center-to-center distance of 3.75 inches, which is six steps. To increase the reliability of the system, the inductive coils are connected alternately to data system A or B. Thus, if one system fails, the DRPI functions at half-accuracy with an effective coil spacing of 7.5 inches, which is 12 steps. Therefore, the normal indication accuracy of the DRPI system is $\pm$ 6 steps ($\pm$ 3.75 inches), and the maximum uncertainty is $\pm$ 12 steps ($\pm$ 7.5 inches). With an indicated deviation of 12 steps between the group step counter and DRPI, the maximum deviation between actual rod position and the demand position could be 24 steps, or 15 inches.

APPLICABLE SAFETY ANALYSES

Control rod misalignment accidents are analyzed in the safety analysis (Ref. 3). The acceptance criteria for addressing control rod inoperability or misalignment is that:

a. There be no violations of:

   1. Specified acceptable fuel design limits, or

   2. Reactor Coolant System (RCS) pressure boundary integrity; and

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

b. The core remains subcritical after accident transients.

Two types of misalignment are distinguished. During movement of a control rod group, one rod may stop moving, while the other rods in the group continue. This condition may cause excessive power peaking. The second type of misalignment occurs if one rod fails to insert upon a reactor trip and remains stuck fully withdrawn. This condition requires an evaluation to determine that sufficient reactivity worth is held in the control rods to meet the SDM requirement with the maximum worth rod stuck fully withdrawn.

Two types of analysis are performed in regard to static rod misalignment (Ref. 3). With control banks at or above their insertion limits, one type of analysis considers the case when any one rod is completely inserted into the core. The second type of analysis considers the case of a completely withdrawn single rod from a bank inserted to its insertion limit. Satisfying limits on departure from nucleate boiling ratio in both of these cases bounds the situation when a rod is misaligned from its group by 12 steps.

Another type of misalignment occurs if one RCCA fails to insert upon a reactor trip and remains stuck fully withdrawn. This condition is assumed in the evaluation to determine that the required SDM is met with the maximum worth RCCA also fully withdrawn (Ref. 3).

The Required Actions in this LCO assure that either deviations from the alignment limits will be corrected or that THERMAL POWER will be adjusted so that excessive local linear heat rates (LHRs) will not occur, and that the requirements on SDM and ejected rod worth are preserved.

Continued operation of the reactor with a misaligned control rod is allowed if the heat flux hot channel factor ($F_Q(Z)$) and the nuclear enthalpy hot channel factor ($F^N_{\Delta H}$) are verified to be within their limits in the COLR and the safety analysis is verified to remain valid. When a control rod is misaligned, the assumptions that are used to determine the rod insertion limits, AFD limits, and quadrant power tilt limits are not preserved. Therefore, the limits may not preserve the design peaking factors, and $F_Q(Z)$ and $F^N_{\Delta H}$ must be verified directly by incore mapping.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

Section B 3.2 (Power Distribution Limits) contains more complete discussions of the relation of $F_Q(Z)$ and $F_{\Delta H}^N$ to the operating limits.

Shutdown and control rod OPERABILITY and alignment are directly related to power distributions and SDM, which are initial conditions assumed in safety analyses. Therefore they satisfy Criterion 2 of the NRC Policy Statement.

LCO

The limits on shutdown or control rod alignments assure that the assumptions in the safety analysis will remain valid. The requirements on operability assure that upon reactor trip, the assumed reactivity will be available and will be inserted. The operability requirements also assure that the RCCAs and banks will move correctly upon command, to maintain the correct power distribution and rod alignment.

The requirement to maintain the rod alignment to within plus or minus 12 steps is conservative. The minimum misalignment assumed in safety analysis is 24 steps (15 inches), and in some cases a total misalignment from fully withdrawn to fully inserted is assumed.

Failure to meet the requirements of this LCO may produce unacceptable power peaking factors and linear heating rates (LHR), or unacceptable SDMs, which may constitute initial conditions inconsistent with the safety analysis.

APPLICABILITY

The requirements on RCCA OPERABILITY and alignment are applicable in MODES 1 and 2 because these are the only MODES in which neutron (or fission) power is generated, and the OPERABILITY (i.e., trippability) and alignment of rods have the potential to affect the safety of the plant. In MODES 3, 4, 5, and 6, the alignment limits do not apply because the control rods are bottomed and the reactor is shut down and not producing fission power. In the shutdown MODES, the OPERABILITY of the shutdown and control rods has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the RCS. See LCO 3.1.1, "Shutdown Margin (SDM)" for SDM in MODES 3, 4, and 5 and LCO 3.9.1, "Boron Concentration," for boron concentration requirements during refueling.

(continued)

BASES (continued)

ACTIONS

A.1.1 and A.1.2

When one or more rods are untrippable, there is a possibility that the required SDM may be adversely affected. Under these conditions, it is important to determine the SDM, and if it is less than the required value, initiate boration until the required SDM is recovered. The Completion Time of 1 hour is adequate to determine SDM and, if necessary, to initiate boration to restore SDM.

In this situation, SDM verification must include the worth of the untrippable rod as well as a rod of maximum worth.

A.2

If the untrippable rod(s) cannot be restored to OPERABLE status, the plant must be brought to a MODE or condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power conditions in an orderly manner without challenging plant systems.

B.1

When a rod becomes misaligned, it can usually be moved and is still trippable. With the OPDMS OPERABLE adverse peaking factors resulting from the misalignment can be detected. If the rod can be realigned within the Completion Time of 8 hours adverse burnup shadowing in the location of the misaligned rod can be avoided. With the OPDMS inoperable xenon redistribution can potentially cause adverse peaking factors which may not be detected. However, if the rod can be realigned within the Completion Time of 1 hour, local xenon redistribution during this short interval will not be significant and operation may proceed without further restriction.

An alternative to realigning a single misaligned RCCA to the group average position is to align the remainder of the group to the position of the misaligned RCCA. However, this must be done without violating the bank sequence, overlap,

(continued)

BASES

ACTIONS

B.1 (continued)

and insertion limits specified in LCO 3.1.5, "Shutdown Bank Insertion Limit," and LCO 3.1.6, "Control Bank Insertion Limits." The Completion Time of 1 hour gives the operator sufficient time to adjust the rod positions in an orderly manner.

B.2.1.1 and B.2.1.2

With a misaligned rod, SDM must be verified within limit or boration must be initiated to restore SDM within limit.

In many cases, realigning the remainder of the group to the misaligned rod may not be desirable. For example, realigning control bank M2 to a rod that is misaligned 15 steps from the top of the core could require insertion of the M1 bank to maintain overlap limits.

Power operation may continue with one RCCA trippable but misaligned, provided that SDM is verified within 1 hour. The Completion Time of 1 hour represents the time necessary to determine the actual unit SDM and, if necessary, aligning and starting the necessary systems and components to initiate boration.

B.2.2, B.2.3, B.2.4, B.2.5, and B.2.6

For continued operation with a misaligned rod, RTP must be reduced, SDM must periodically be verified within limits, and the safety analyses must be re-evaluated to confirm continued operation is permissible. A note has been added indicating that Required Actions B.2.4 and B.2.5, F_Q and $F_{\Delta H}$ verification, are only required when the OPDMS is inoperable and therefore unavailable to continuously monitor the core power distribution.

Reduction of power to 75% of RTP ensures that local LHR increases due to a misaligned RCCA will not cause the core design criteria to be exceeded (Ref. 3). The Completion Time of 2 hours gives the operator sufficient time to accomplish an orderly power reduction without challenging the Reactor Protection System.

(continued)

BASES

ACTIONS

B.2.2, B.2.3, B.2.4, B.2.5, and B.2.6 (continued)

When a rod is known to be misaligned, there is a potential to impact the SDM. Since the core conditions can change with time, periodic verification of SDM is required. A Frequency of 12 hours is sufficient to ensure this requirement continues to be met.

Online monitoring of core power distribution by the OPDMS, or verifying that $F_Q(Z)$ and $F^N_{\Delta H}$ are within the required limits when the OPDMS is inoperable, ensures that current operation at 75% of RTP with a rod misaligned is not resulting in power distributions which may invalidate safety analysis assumptions at full power. The Completion Time of 72 hours allows sufficient time to obtain flux maps of the core power distribution using the incore flux mapping system and to calculate $F_Q(Z)$ and $F^N_{\Delta H}$.

Once current conditions have been verified acceptable, time is available to perform evaluations of accident analysis to determine that core limits will not be exceeded during a Design Basis Accident (DBA) for the duration of operation under these conditions. A Completion Time of 5 days is sufficient time to obtain the required input data and to perform the analysis.

C.1

When Required Actions cannot be completed within their Completion Times, the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours, which obviates concerns about the development of undesirable xenon or power distributions. The allowed Completion Time of 6 hours is reasonable, based on operating experience, for reaching MODE 3 from full power condition in an orderly manner and without challenging the plant systems.

D.1.1 and D.1.2

More than one control rod becoming misaligned from its group average position is not expected, and has the potential to reduce SDM. Therefore, SDM must be evaluated. One hour allows the operator adequate time to determine SDM.

(continued)

BASES

ACTIONS

D.1.1 and D.1.2 (continued)

Restoration of the required SDM, if necessary, requires increasing the RCS boron concentration to provide negative reactivity, as described in the bases of LCO 3.1.1. The required completion time of 1 hour for initiating boration is reasonable based on the time required for potential xenon redistribution, the low probability of an accident occurring, and the steps required to complete the action. This allows the operator sufficient time to align the required valves and start the CVS makeup pumps. Boration will continue until the required SDM is restored.

D.2.1 and D.2.2

If more than one rod is found to be misaligned or becomes misaligned because of bank movement, the unit conditions fall outside of the accident analysis assumptions. Since automatic bank sequencing would continue to cause misalignment, the rods must be brought to within the alignment limits within 6 hours or the unit must be brought to a MODE or Condition in which the LCO requirements are not applicable. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours.

The allowed Completion Time is reasonable, based on operating experience, for reaching MODE 3 from full power in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.4.1

Verification that individual rod positions are within alignment limits at a Frequency of 12 hours provides a history that allows the operator to detect that a rod is beginning to deviate from its expected position. If the rod position deviation monitor is inoperable, a Frequency of 4 hours accomplishes the same goal. The specified Frequency takes into account other rod position information that is continuously available to the operator in the main control room so that during actual rod motion, deviations can immediately be detected.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.4.2

Verifying each control rod is OPERABLE would require that each rod be tripped. However, in MODES 1 and 2, tripping each control rod would result in radial or axial power tilts, or oscillations. Exercising each individual control rod every 92 days provides increased confidence that all rods continue to be OPERABLE without exceeding the alignment limit, even if they are not regularly tripped. Moving each control rod by 10 steps will not cause radial or axial power tilts, or oscillations, to occur. The 92 day Frequency takes into consideration other information available to the operator in the control room and SR 3.1.4.1, which is performed more frequently and adds to the determination of OPERABILITY of the rods. Between required performances of SR 3.1.4.2 (determination of control rod OPERABILITY by movement), if a control rod(s) is discovered to be immovable, but remains trippable and aligned, the control rod(s) is considered to be OPERABLE. At any time, if a control rod(s) is immovable, a determination of the trippability (OPERABILITY) of the control rod(s) must be made, and appropriate action taken.

SR 3.1.4.3

Verification of rod drop times allows the operator to determine that the maximum rod drop time permitted is consistent with the assumed rod drop time used in the safety analysis. Measuring rod drop times prior to reactor criticality, after each reactor vessel head removal, ensures that the reactor internals and rod drive mechanism will not interfere with rod motion or rod drop time, and that no degradation in these systems has occurred that would adversely affect control rod motion or drop time. This testing is performed with all RCPs operating and the average moderator temperature > 500°F to simulate a reactor trip under conservative conditions.

This Surveillance is performed during a plant outage due to the plant conditions needed to perform the SR and the potential for an unplanned plant transient if the Surveillance were performed with the reactor at power.

(continued)

BASES (continued)

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10 and GDC 26.
2. 10 CFR 50.46.
3. Chapter 15, "Accident Analysis."

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.5 Shutdown Bank Insertion Limits

BASES

BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in the safety analyses which assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available ejected rod worth SDM and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1), and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The rod cluster control assemblies (RCCAs) are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs consists of two groups that are moved in a staggered fashion, but always within one step of each other. The AP600 design has five control banks and three shutdown banks. See LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod OPERABILITY and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements.

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally automatically controlled by the Plant Control System (PLS), but they can also be manually controlled. They are capable of adding negative reactivity very quickly (compared to borating). The control banks must be

(continued)

BASES

BACKGROUND (continued)

maintained above designed insertion limits and are typically near the fully withdrawn position during normal full power operations. Hence, they are not capable of adding a large amount of positive reactivity. Boration or dilution of the Reactor Coolant System (RCS) compensates for the reactivity changes associated with large changes in RCS temperature. The design calculations are performed with the assumption that the shutdown banks are withdrawn first. The shutdown banks can be fully withdrawn without the core going critical. This provides available negative reactivity in the event of boration errors. The shutdown banks are controlled manually by the control room operator. During normal unit operation, the shutdown banks are either fully withdrawn or fully inserted. The shutdown banks must be completely withdrawn from the core, prior to withdrawing any control banks during an approach to criticality. The shutdown banks are then left in this position until the reactor is shut down. They affect core power and burnup distribution, and add negative reactivity to shut down the reactor upon receipt of a reactor trip signal.

APPLICABLE SAFETY ANALYSES

On a reactor trip, all RCCAs (shutdown banks and control banks), except the most reactive RCCA, are assumed to insert into the core. The shutdown banks shall be at or above their insertion limits and available to insert the maximum amount of negative reactivity on a reactor trip signal. The control banks may be partially inserted in the core as allowed by LCO 3.1.6, "Control Bank Insertion Limits." The shutdown bank and control bank insertion limits are established to ensure that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM)") following a reactor trip from full power. The combination of control banks and shutdown banks (less the most reactive RCCA which is assumed to be fully withdrawn) is sufficient to take the reactor from full power conditions at rated temperature to zero power, and to maintain the required SDM at the rated no load temperature (Ref. 3). The shutdown bank insertion limit also limits the reactivity worth of an ejected shutdown bank rod.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)	The acceptance criteria for addressing shutdown and control rod bank insertion limits and inoperability or misalignment is that: a. There be no violations of: 1. specified acceptable fuel design limits, or, 2. RCS pressure boundary integrity; and b. The core remains subcritical after accident transients. As such, the shutdown bank insertion limits affect safety analysis involving core reactivity and SDM (Ref. 3). The shutdown bank insertion limits preserve an initial condition assumed in the safety analyses and satisfies Criterion 2 of the NRC Policy Statement.
LCO	The shutdown banks must be within their insertion limits any time the reactor is critical or approaching criticality. This in conjunction with LCO 3.1.6, "Control Bank Insertion Limits," ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip. The shutdown bank insertion limits are defined in the COLR.
APPLICABILITY	The shutdown banks must be within their insertion limits with the reactor in MODE 1 and MODE 2. The applicability in MODE 2 begins prior to initial control bank withdrawal during an approach to criticality, and continues throughout MODE 2 until all control bank rods are again fully inserted by reactor trip or by shutdown. This ensures that a sufficient amount of negative reactivity is available to shut down the reactor and maintain the required SDM following a reactor trip. In MODE 3, 4, 5, or 6 the shutdown banks are fully inserted in the Core and contribute to the SDM. Refer to LCO 3.1.1 for SDM requirements in MODES 3, 4, and 5. LCO 3.9.1, "Boron Concentration" ensures adequate SDM in MODE 6.

(continued)

BASES

APPLICABILITY (continued)

The Applicability requirements have been modified by a Note indicating that the LCO requirement is suspended during SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the shutdown bank to move below the LCO limits, which would normally violate the LCO.

ACTIONS

A.1.1, A.1.2, and A.2

When one or more shutdown banks is not within insertion limits, 2 hours are allowed to restore the shutdown banks to within the insertion limits. This is necessary because the available SDM may be significantly reduced with one or more of the shutdown banks not within their insertion limits. Also, verification of SDM or initiation of boration within 1 hour is required, since the SDM in MODES 1 and 2 is ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1). If shutdown banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

The allowed Completion Time of 2 hours provides an acceptable time for evaluating and repairing minor problems without allowing the plant to remain in an unacceptable condition for an extended period of time.

B.1

If the shutdown banks cannot be restored to within their insertion limits within 2 hours, the unit must be brought to a MODE where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.5.1

Verification that the shutdown banks are within their insertion limits prior to an approach to criticality ensures that when the reactor is critical, or being taken critical, the shutdown banks will be available to shut down the

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.1.5.1 (continued)

reactor, and the required SDM will be maintained following a reactor trip. This SR and Frequency ensure that the shutdown banks are withdrawn before the control banks are withdrawn during a unit startup.

Since the shutdown banks are positioned manually by the main control room operator, a verification of shutdown bank position at a Frequency of 12 hours, after the reactor is taken critical, is adequate to ensure that they are within their insertion limits. Also, the 12 hours Frequency takes into account other information available in the main control room for the purpose of monitoring the status of shutdown rods.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10, GDC 26, and GDC 28.
2. 10 CFR 50.46.
3. Chapter 15, "Accident Analysis."

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.6 Control Bank Insertion Limits

BASES

BACKGROUND

The insertion limits of the shutdown and control rods are initial assumptions in the safety analyses that assume rod insertion upon reactor trip. The insertion limits directly affect core power and fuel burnup distributions and assumptions of available SHUTDOWN MARGIN (SDM), and initial reactivity insertion rate.

The applicable criteria for these reactivity and power distribution design requirements are 10 CFR 50, Appendix A, GDC 10, "Reactor Design," GDC 26, "Reactivity Control System Redundancy and Protection," GDC 28, "Reactivity Limits" (Ref. 1) and 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors" (Ref. 2). Limits on control rod insertion have been established, and all rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

The rod cluster control assemblies (RCCAs) are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control. A group consists of two or more RCCAs that are electrically paralleled to step simultaneously. A bank of RCCAs consists of two groups that are moved in a staggered fashion, but always within 1 step of each other. The AP600 design has five control banks and three shutdown banks. See LCO 3.1.4, "Rod Group Alignment Limits," for control and shutdown rod operability and alignment requirements, and LCO 3.1.7, "Rod Position Indication," for position indication requirements.

The control bank insertion sequence and overlap limits are specified in the COLR. The control banks are required to be at or above the insertion limit lines.

The control banks are used for precise reactivity control of the reactor. The positions of the control banks are normally controlled automatically by the Plant Control System (PLS), but can also be manually controlled. They are capable of adding reactivity very quickly (compared to borating or diluting).

(continued)

BASES

BACKGROUND (continued)

The power density at any point in the core must be limited so that the fuel design criteria are maintained. Together, LCO 3.1.4, "Rod Group Alignment Limits," LCO 3.1.5, "Shutdown Bank Insertion Limits," LCO 3.1.6, "Control Bank Insertion Limits," and LCO 3.2.5, "OPDMS - Monitored Powered Distribution Parameters," when the OPDMS is OPERABLE, or LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," when the OPDMS is inoperable, provide limits on control component operation and on monitored process variables which ensure that the core operates within the fuel design criteria.

The shutdown and control bank insertion and alignment limits and power distribution limits are process variables that together characterize and control the three dimensional power distribution of the reactor core. Additionally, the control bank insertion limits control the reactivity that could be added in the event of a rod ejection accident, and the shutdown and control bank insertion limits assure the required SDM is maintained.

Operation within the subject LCO limits will prevent fuel cladding failures that would breach the primary fission product barrier and release fission products to the reactor coolant in the event of a loss of coolant accident (LOCA), loss of flow, ejected rod, or other accident requiring termination by a Reactor Trip System (RTS) trip function.

APPLICABLE SAFETY ANALYSES

The shutdown and control bank insertion limits, AFD and QPTR LCOs are required to prevent power distributions that could result in fuel cladding failures in the event of a LOCA, loss of flow, ejected rod, or other accident requiring termination by an RTS trip function.

The acceptance criteria for addressing shutdown and control bank insertion limits and inoperability or misalignment are that:

a. There be no violations of:

    1. specified fuel design limits, or
    2. Reactor Coolant System (RCS) pressure boundary integrity; and

b. The core remains subcritical after accident transients.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

As such, the shutdown and control bank insertion limits affect safety analysis involving core reactivity and power distributions (Ref. 3).

The SDM requirement is ensured by limiting the control and shutdown bank insertion limits so that allowable inserted worth of the RCCAs is such that sufficient reactivity is available in the rods to shut down the reactor to hot zero power with a reactivity margin which assumes the maximum worth RCCA remains fully withdrawn upon trip (Ref. 3).

Operation at the insertion limits or AFD limits may approach the maximum allowable linear heat generation rate or peaking factor, with the allowed QPTR present. Operation at the insertion limit may also indicate the maximum ejected RCCA worth could be equal to the limiting value in fuel cycles that have sufficiently high ejected RCCA worth.

The control and shutdown bank insertion limits ensure that safety analyses assumptions for SDM, ejected rod worth, and power distribution peaking factors are preserved (Ref. 3).

The insertion limits satisfy Criterion 2 of the NRC Policy Statement in that they are initial conditions assumed in the safety analysis.

LCO

The limits on control banks sequence, overlap, and physical insertion as defined in the COLR, must be maintained because they serve the function of preserving power distribution, ensuring that the SDM is maintained, ensuring that ejected rod worth is maintained, and ensuring adequate negative reactivity insertion is available on trip. The overlap between control banks provides more uniform rates of reactivity insertion and withdrawal and is imposed to maintain acceptable power peaking during control bank motion.

APPLICABILITY

The control bank sequence, overlap, and physical insertion limits shall be maintained with the reactor in MODES 1 and 2 with $k_{eff} \geq 1.0$. These limits must be maintained since they preserve the assumed power distribution, ejected rod worth, SDM, and reactivity rate insertion assumptions.

(continued)

BASES

APPLICABILITY (continued)

Applicability in MODES 3, 4, and 5 is not required, since neither the power distribution nor ejected rod worth assumptions would be exceeded in these MODES.

The applicability requirements are modified by a Note indicating the LCO requirements are suspended during the performance of SR 3.1.4.2. This SR verifies the freedom of the rods to move, and requires the control bank to move below the LCO limits, which would violate the LCO.

ACTIONS

A.1.1, A.1.2, A.2, B.1.1, B.1.2, and B.2

When the control banks are outside the acceptable insertion limits, they must be restored to within those limits. This restoration can occur in two ways:

a. Reducing power to be consistent with rod position; or

b. Moving rods to be consistent with power.

Also, verification of SDM or initiation of boration to regain SDM is required within 1 hour, since the SDM in MODES 1 and 2, normally ensured by adhering to the control and shutdown bank insertion limits (see LCO 3.1.1, "SHUTDOWN MARGIN (SDM)"), has been upset. If control banks are not within their insertion limits, then SDM will be verified by performing a reactivity balance calculation, considering the effects listed in the BASES for SR 3.1.1.1.

Similarly, if the control banks are found to be out of sequence or in the wrong overlap configuration, they must be restored to meet the limits.

Operation beyond the LCO limits is allowed for a short time period in order to take conservative action because the simultaneous occurrence of either a LOCA, loss of flow accident, ejected rod accident, or other accident during this short time period, together with an inadequate power distribution or reactivity capability, has an acceptably low probability.

The allowed Completion Time of 2 hours for restoring the banks to within the insertion, sequence and overlap limits

(continued)

BASES

ACTIONS

A.1.1, A.1.2, A.2, B.1.1, B.1.2, and B.2 (continued)

provides an acceptable time for evaluating and repairing minor problems without allowing the plant to remain outside the insertion limits for an extended period of time.

C.1

If Required Actions A.1 and A.2, or B.1 and B.2 cannot be completed within the associated Completion Times, the plant must be brought to MODE 3 where the LCO is not applicable. The allowed Completion Time of 6 hours is reasonable based on operating experience for reaching the required MODE from full power condition in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.6.1

This Surveillance is required to ensure that the reactor does not achieve criticality with the control banks below their insertion limits.

The estimated critical position (ECP) depends upon a number of factors, one of which is xenon concentration. If the ECP was calculated long before criticality, xenon concentration could change to make the ECP substantially in error. Conversely, determining the ECP immediately before criticality could be an unnecessary burden. There are a number of unit parameters requiring operator attention at that point. Performing the ECP calculation within 4 hours prior to criticality avoids a large error from changes in xenon concentration, but allows the operator some flexibility to schedule the ECP calculation with other startup activities.

SR 3.1.6.2

With an OPERABLE bank insertion limit monitor, verification of the control banks insertion limits at a Frequency of 12 hours is sufficient to ensure OPERABILITY of the bank insertion limit monitor and to detect control banks that may be approaching the insertion limits since, normally, very little rod motion occurs in 12 hours. If the insertion

(continued)

BASES

SURVEILLANCE REQUIREMENTS	SR 3.1.6.2 (continued) limit monitor becomes inoperable, verification of the control bank position at a Frequency of 4 hours is sufficient to detect control banks that may be approaching the control bank insertion limits. SR 3.1.6.3 When control banks are maintained within their insertion limits as checked by SR 3.1.6.2 above, it is unlikely that their sequence and overlap will not be in accordance with requirements provided in the COLR. A Frequency of 12 hours is consistent with the insertion limit check above in SR 3.1.6.2.
REFERENCES	1. 10CFR50, Appendix A, GDC 10, GDC 26, and GDC 28. 2. 10CFR50.46. 3. Chapter 15, "Accident Analysis."

B 3.1 REACTIVITY CONTROL SYSTEM

B 3.1.7 Rod Position Indication

BASES

BACKGROUND

According to GDC 13 (Ref. 1), instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences (AOOs), and accident conditions must be OPERABLE. LCO 3.1.7 is required to ensure OPERABILITY of the control rod position indicators to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits.

The OPERABILITY, including position indication, of the shutdown and control rods is an initial assumption in the safety analyses that assume rod insertion upon reactor trip. Maximum rod misalignment is an initial assumption in the RCCA misalignment safety analysis that directly affects core power distributions and assumptions of available SDM. Rod position indication is required to assess OPERABILITY and misalignment.

Mechanical or electrical failures may cause a control rod to become inoperable or to become misaligned from its group. control rod inoperability or misalignment may cause increased power peaking due to the asymmetric reactivity distribution and a reduction in the total available rod worth for reactor shutdown. Therefore, control rod alignment and OPERABILITY are related to core operation in design power peaking limits and the core design requirement of a minimum SDM.

Limits on control rod alignment and OPERABILITY have been established, and rod positions are monitored and controlled during power operation to ensure that the power distribution and reactivity limits defined by the design power peaking and SDM limits are preserved.

Rod cluster control assemblies (RCCAs), or rods, are moved out of the core (up or withdrawn) or into the core (down or inserted) by their control rod drive mechanisms. The RCCAs are divided among control banks and shutdown banks. Each bank may be further subdivided into two groups to provide for precise reactivity control.

(continued)

BASES

BACKGROUND (continued)

The axial position of shutdown rods and control rods are determined by two separate and independent systems: the Bank Demand Position Indication System (commonly called group step counters) and the Digital Rod Position Indication (DRPI) System.

The Bank Demand Position Indication System counts the pulses from the Rod Control System that move the rods. There is one step counter for each group of rods. Individual rods in a group receive the same signal to move and should, therefore, be at the same position indicated by the group step counter for that group. The Bank Demand Position Indication System is considered highly precise ($\pm$ 1 step or $\pm \frac{5}{8}$ inch). If a rod does not move one step for each demand pulse, the step counter will still count the pulse and incorrectly reflect the position of the rod.

The DRPI System provides a highly accurate indication of actual control rod position, at a lower precision than the step counters. This system is based on inductive analog signals from a series of coils spaced along a hollow tube with a center to center distance of 3.75 inches, which is 6 steps. To increase the reliability of the system, the inductive coils are connected alternately to data system A or B. Thus, if one system fails, the DRPI will function at half accuracy with an effective coil spacing of 7.5 inches, which is 12 steps. Therefore, the normal indication accuracy of the DRPI System is $\pm$ 6 steps ($\pm$ 3.75 inches), and the maximum uncertainty is $\pm$ 12 steps ($\pm$ 7.5 inches). With an indicated deviation of 12 steps between the group step counter and DRPI, the maximum deviation between actual rod position and the demand position could be 24 steps, or 15 inches.

APPLICABLE SAFETY ANALYSES

Control and shutdown rod position accuracy is essential during power operation. Power peaking, ejected rod worth, or SDM limits may be violated in the event of a Design Basis Accident (Ref. 2), with control or shutdown rods operating outside their limits undetected. Therefore, the acceptance criteria for rod position indication is that rod positions must be known with sufficient accuracy in order to verify the core is operating within the group sequence, overlap, design peaking limits, ejected rod worth, and with minimum

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

SDM (LCO 3.1.5, "Shutdown Bank Insertion Limits," LCO 3.1.6, "Control Bank Insertion Limits"). The rod positions must also be known in order to verify the alignment limits are preserved (LCO 3.1.4, "Rod Group Alignment Limits"). Control rod positions are continuously monitored to provide operators with information that assures the plant is operating within the bounds of the accident analysis assumptions.

The control rod position indicator channels satisfy Criterion 2 of the NRC Policy Statement. The control rod position indicators monitor control rod position, which is an initial condition of the accident.

LCO

LCO 3.1.7 specifies that one DRPI System and one Bank Demand Position Indication System be OPERABLE for each control rod. For the control rod position indicators to be OPERABLE requires meeting the SR of the LCO and the following:

a. The DRPI System indicates within 12 steps of the group step counter demand position as required by LCO 3.1.4, "Rod Group Alignment Limits";

b. For the DRPI System there are no failed coils; and

c. The Bank Demand Indication System has been calibrated either in the fully inserted position or to the DRPI System.

The 12 step agreement limit between the Bank Demand Position Indication System and the DRPI System indicates that the Bank Demand Position Indication System is adequately calibrated and can be used for indication of the measurement of control rod bank position.

A deviation of less than the allowable limit given in LCO 3.1.4 in position indication for a single control rod ensures high confidence that the position uncertainty of the corresponding control rod group is within the assumed values used in the analysis (that specified control rod group insertion limits).

These requirements provide adequate assurance that control rod position indication during power operation and PHYSICS

(continued)

BASES

LCO (continued)	TESTS is accurate, and that design assumptions are not challenged. OPERABILITY of the position indicator channels ensures that inoperable, misaligned, or mispositioned control rods can be detected. Therefore, power peaking, ejected rod worth, and SDM can be controlled within acceptable limits.
APPLICABILITY	The requirements on the DRPI and step counters are only applicable in MODES 1 and 2 (consistent with LCOs 3.1.4, 3.1.5, and 3.1.6), because these are the only MODES in which power is generated, and the OPERABILITY and alignment of rods has the potential to affect the safety of the plant. In the shutdown MODES, the OPERABILITY of the shutdown and control banks has the potential to affect the required SDM, but this effect can be compensated for by an increase in the boron concentration of the Reactor Coolant System (RCS).
ACTIONS	The ACTIONS table is modified by a Note indicating that a separate Condition entry is allowed for each inoperable rod position indicator per group and each demand position indicator per bank. This is acceptable because the Required Actions for each Condition provide appropriate compensatory actions for each inoperable position indicator. <u>A.1</u> When one DRPI channel per group fails, the position of the rod can still be determined by use of the On-line Power Distribution Monitoring System (OPDMS). Based on experience, normal power operation does not require excessive movement of banks. If a bank has been significantly moved, the Actions of B.1 or B.2 below are required. Therefore, verification of RCCA position within the Completion Time of 8 hours is adequate to allow continued full power operation, since the probability of simultaneously having a rod significantly out of position and an event sensitive to that rod position is small. <u>A.2</u> Reduction of THERMAL POWER to ≤ 50% RTP puts the core into a condition where rod position is not significantly affecting core peaking factors (Ref. 2).

(continued)

BASES

ACTIONS

A.2 (continued)

The allowed Completion Time of 8 hours is reasonable, based on operating experience, for reducing power to ≤ 50% RTP from full power conditions without challenging plant systems and allowing for rod position determination by Required Action A.1 above.

B.1 and B.2

These Required Actions clarify that when one or more rods with inoperable position indicators have been moved in excess of 24 steps in one direction since the position was last determined, the Required Actions of A.1 and A.2 are still appropriate but must be initiated promptly under Required Action B.1 to begin verifying that these rods are still properly positioned relative to their group positions.

If, within 4 hours, the rod positions have not been determined, THERMAL POWER must be reduced to ≤ 50% RTP within 8 hours to avoid undesirable power distributions that could result from continued operation at > 50% RTP, if one or more rods are misaligned by more than 24 steps. The allowed Completion Time of 8 hours provides an acceptable period of time to verify the rod positions.

C.1.1 and C.1.2

With one demand position indicator per bank inoperable, the rod positions can be determined by the DRPI System. Since normal power operation does not require excessive movement of rods, verification by administrative means that the rod position indicators are OPERABLE and the most withdrawn rod and the least withdrawn rod are ≤ 12 steps apart within the allowed Completion Time of once every 8 hours is adequate.

C.2

Reduction of THERMAL POWER to ≤ 50% RTP puts the core into a condition where rod position is not significantly affecting core peaking factor limits (Ref. 2). The allowed Completion

(continued)

BASES

ACTIONS

C.2 (continued)

Time of 8 hours provides an acceptable period of time to verify the rod positions per Required Actions C.1.1 and C.1.2 or reduce power to ≤ 50% RTP.

D.1

If the Required Actions cannot be completed within the associated Completion Time, the plant must be brought to a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours. The allowed Completion Time is reasonable, based on operating experience, for reaching the required MODE from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.7.1

Verification that the DRPI agrees with the demand position within 12 steps provides assurance that the DRPI is operating correctly. Since the DRPI does not display the actual shutdown rod positions between 18 and 210 steps, only points within the indicated ranges are compared.

The 24 month Frequency is based on the need to perform this Surveillance under conditions that apply during a refueling outage and the potential for unnecessary plant transients if the SR is performed with the reactor at power. Operating experience has shown these components virtually always pass the SR when performed on the 24 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

REFERENCES

1. 10 CFR 50, Appendix A, GDC 13.

2. Chapter 15, "Accident Analysis."

B 3.1 REACTIVITY CONTROL SYSTEMS

B 3.1.8 PHYSICS TESTS Exceptions - MODE 2

BASES

BACKGROUND

The primary purpose of the MODE 2 PHYSICS TESTS exceptions is to permit relaxations of existing LCOs to allow certain PHYSICS TESTS to be performed.

Section XI of 10 CFR 50, Appendix B, (Ref. 1) requires that a test program be established to ensure that structures, systems, and components will perform satisfactorily in service. All functions necessary to ensure that the specified design conditions are not exceeded during normal operation and anticipated operational occurrences must be tested. This testing is an integral part of the design, construction, and operation of the plant. Requirements for notification of the NRC, for the purpose of conducting tests and experiments, are specified in 10 CFR 50.59 (Ref. 2).

The key objectives of a test program are to (Ref. 3):

a. Ensure that the facility has been adequately designed;

b. Validate the analytical models used in the design and analysis;

c. Verify the assumptions used to predict unit response;

d. Ensure that installation of equipment in the facility has been accomplished in accordance with the design; and

e. Verify that the operating and emergency procedures are adequate.

To accomplish these objectives, testing is performed prior to initial criticality, during startup, during low power operations, during power ascension, at high power and after each refueling. The PHYSICS TEST requirements for reload fuel cycles assure that the operating characteristics of the core are consistent with the design predictions and that the core can be operated as designed (Ref. 4).

(continued)

BASES

BACKGROUND (continued)

PHYSICS TEST procedures are written and approved in accordance with established formats. The procedures include information necessary to permit a detailed execution of the testing required, to ensure that the design intent is met. PHYSICS TESTS are performed in accordance with these procedures and test results are approved prior to continued power escalation and long-term power operation.

The typical PHYSICS TESTS performed for reload fuel cycles (Ref. 4) in MODE 2 are listed below:

a. Critical Boron Concentration – Control Rods Withdrawn;

b. Control Rod Worth;

c. Isothermal Temperature Coefficient (ITC).

These tests are performed in MODE 2. These and other supplementary tests may be required to calibrate the nuclear instrumentation or to diagnose operational problems. These tests may cause the operating controls and process variables to deviate from their LCO requirements during their performance.

a. The Critical Boron Concentration – Control Rods Withdrawn Test measures the critical boron concentration at hot zero power (HZP). With rods out, the lead control bank is at or near its fully withdrawn position. HZP is where the core is critical (k_{eff} = 1.0), and the Reactor Coolant System (RCS) is at design temperature and pressure for zero power. Performance of this test should not violate any of the referenced LCOs.

b. The Control Rod Worth Test is used to measure the reactivity worth of selected control banks. This test is performed at HZP and has four alternative methods of performance. The first method, the Boron Exchange Method, varies the reactor coolant boron concentration and moves the selected control bank in response to the changing boron concentration. The reactivity changes are measured with a reactivity computer. This sequence is repeated for the remaining control banks. The second method, the Rod Swap Method, measures the worth of a predetermined reference bank using the Boron Exchange Method above. The reference bank is then nearly fully

(continued)

BASES

BACKGROUND (continued)

inserted into the core. The selected bank is then inserted into the core as the reference bank is withdrawn. The HZP critical conditions are then determined with the selected bank fully inserted into the core. The worth of the selected bank is calculated based on the position of the reference bank with respect to the selected bank. This sequence is repeated as necessary for the remaining control banks. The third method, the Boron Endpoint Method, moves the selected control bank over its entire length of travel and while varying the reactor coolant boron concentration to maintain HZP criticality again. The difference in boron concentration is the worth of the selected control bank. This sequence is repeated for the remaining control banks. The fourth method, Dynamic Rod Worth Measurement (DRWM), moves each bank, individually, into the core to determine its worth. The bank is dynamically inserted into the core while data is acquired from the excore channel. While the bank is being withdrawn, the data is analyzed to determine the worth of the bank. This is repeated for each control and shutdown bank. Performance of this test will violate LCO 3.1.4, "Rod Group Alignment Limits," LCO 3.1.5, "Shutdown Bank Insertion Limit," or LCO 3.1.6, "Control Bank Insertion Limits."

c. The ITC Test measures the ITC of the reactor. This test is performed at HZP. The method is to vary the RCS temperature in a slow and continuous manner. The reactivity change is measured with a reactivity computer as a function of the temperature change. The ITC is the slope of the reactivity versus the temperature plot. The test is repeated by reversing the direction of the temperature change and the final ITC is the average of the two calculated ITCs. Performance of this test could violate LCO 3.4.2, "RCS Minimum Temperature for Criticality."

APPLICABLE SAFETY ANALYSES

The fuel is protected by LCOs that preserve the initial conditions of the core assumed during the safety analyses. The methods for development of the LCOs that are excepted by this LCO are described in the Westinghouse Reload Safety Evaluation Methodology report (Ref. 5). The above mentioned PHYSICS TESTS, and other tests that may be required to

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

calibrate nuclear instrumentation or to diagnose operational problems, may require the operating control or process variables to deviate from their LCO limitations.

Chapter 14 defines requirements for initial testing of the facility, including low power PHYSICS TESTS. Sections 14.2.10.2 and 14.2.10.3 (Ref. 6) summarize the initial criticality and low power tests.

Requirements for reload fuel cycle PHYSICS TESTS are defined in ANSI/ANS-19.6.1-1985 (Ref. 4). Although these PHYSICS TESTS are generally accomplished within the limits for the LCOs, conditions may occur when one or more LCOs must be suspended to make completion of PHYSICS TESTS possible or practical. This is acceptable as long as the fuel design criteria are not violated. When one or more of the requirements specified in:

LCO 3.1.3	"Moderator Temperature Coefficient (MTC),"
LCO 3.1.4	"Rod Group Alignment Limits,"
LCO 3.1.5	"Shutdown Bank Insertion Limit,"
LCO 3.1.6	"Control Bank Insertion Limits," and
LCO 3.4.2	"Minimum Temperature for Criticality,"

are suspended for PHYSICS TESTS, the fuel design criteria are preserved as long as the power level is limited to $\leq$ 5% RTP, the reactor coolant temperature is kept $\geq$ 529°F, and SDM is $\geq$ 1.6% $\Delta k/k$.

PHYSICS TESTS include measurement of core nuclear parameters or the exercise of control components that affect process variables. Also involved are the movable control components (control and shutdown rods), which are required to shut down the reactor. The limits for these variables are specified for each fuel cycle in the COLR. PHYSICS TESTS meet the criteria for inclusion in the Technical Specifications, since the components and process variable LCOs suspended during PHYSICS TESTS meet Criteria 1, 2, and 3 of the NRC Policy Statement.

The NRC Policy Statement allows special test exceptions (STE) to be included as part of the LCO that they affect. It was decided, however, to retain this STE as a separate LCO because it was less cumbersome and provided additional clarity.

(continued)

BASES (continued)

LCO

This LCO allows the reactor parameters of MTC and minimum temperature for criticality to be outside their specified limits. In addition, it allows selected control and shutdown rods to be positioned outside of their specified alignment and insertion limits. Operation beyond specified limits is permitted for the purpose of performing PHYSICS TESTS and poses no threat to fuel integrity, provided the SRs are met.

The requirements of LCO 3.1.3, LCO 3.1.4, LCO 3.1.5, LCO 3.1.6, and LCO 3.4.2 may be suspended during the performance of PHYSICS TESTS provided:

a. RCS lowest loop average temperature is ≥ 529°F, and

b. SDM ≥ 1.6% Δk/k.

APPLICABILITY

This LCO is applicable in MODE 2 when performing low power PHYSICS TESTS. The applicable PHYSICS TESTS are performed in MODE 2 at HZP.

ACTIONS

A.1 and A.2

If the SDM requirement is not met, boration must be initiated promptly. A Completion Time of 15 minutes is adequate for an operator to correctly align and start the required systems and components. The operator should begin boration with the best source available for the plant conditions. Boration will be continued until SDM is within limit.

B.1

When THERMAL POWER is > 5% RTP, the only acceptable action is to open the reactor trip breakers (RTBs) to prevent operation of the reactor beyond its design limits. Immediately opening the RTBs will shut down the reactor and prevent operation of the reactor outside of its design limits.

(continued)

BASES

ACTIONS (continued)

C.1

When the RCS lowest T_{avg} is < 529°F, the appropriate action is to restore T_{avg} to within its specified limit. The allowed Completion Time of 15 minutes provides time for restoring T_{avg} to within limits without allowing the plant to remain in an unacceptable condition for an extended period of time. Operation with the reactor critical and with temperature below 529°F could violate the assumptions for accidents analyzed in the safety analyses.

D.1

If the Required Actions cannot be completed within the associated Completion Time, the plant must be placed in a MODE in which the requirement does not apply. To achieve this status, the plant must be brought to at least MODE 3 within an additional 15 minutes. The Completion Time of 15 additional minutes is reasonable, based on operating experience, to reach MODE 3 from MODE 2 HZP conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.1.8.1

The power range and intermediate range neutron detectors must be verified to be OPERABLE in MODE 2 by LCO 3.3.1 "Reactor Trip System (RTS) Instrumentation." A CHANNEL OPERATIONAL TEST is performed on each power range and intermediate range channel within 12 hours prior to initiation of the PHYSICS TESTS. This will ensure that the RTS is properly aligned to provide the required degree of core protection during the performance of the PHYSICS TESTS. The 12 hour time limit is sufficient to ensure that the instrumentation is OPERABLE shortly before initiating PHYSICS TESTS.

SR 3.1.8.2

Verification that the RCS lowest loop T_{avg} is $\geq$ 529°F and power $\leq$ 5% RTP will ensure that the unit is not operating in a condition that could invalidate the safety analyses. Verification of the RCS temperature at a Frequency of 30 minutes during the performance of the PHYSICS TESTS will provide assurance that the initial conditions of the safety analyses are not violated.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.1.8.3

The SDM is verified by performing a reactivity balance calculation, considering the following reactivity effects:

a. RCS boron concentration;

b. Control bank position;

c. RCS average temperature;

d. Fuel burnup based on gross thermal energy generation;

e. Xenon concentration;

f. Samarium concentration; and

g. Isothermal temperature coefficient (ITC).

Using the ITC accounts for Doppler reactivity in this calculation because the reactor is subcritical, and the fuel temperature will be changing at the same rate as the RCS.

The Frequency of 24 hours is based on the generally slow change in required boron concentration and on the low probability of an accident occurring without the required SDM.

REFERENCES

1. 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants."

2. 10 CFR 50.59, "Changes, Tests and Experiments."

3. Regulatory Guide 1.68, Revision 2, "Initial Test Programs for Water-Cooled Nuclear Power Plants," August 1978.

4. ANSI/ANS-19.6.1-1985, "Reload Startup Physics Tests for Pressurized Water Reactors," American National Standards Institute, December 13, 1985.

5. WCAP-9273-NP-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985.

6. Chapter 14, "Initial Testing Program."

B 3.1 REACTIVITY CONTROL

B 3.1.9 Chemical and Volume Control System (CVS) Demineralized Water Isolation Valves

BASES

BACKGROUND

One of the principle functions of the CVS system is to maintain the reactor coolant chemistry conditions by controlling the concentration of boron in the coolant for plant startups, normal dilution to compensate for fuel depletion, and shutdown boration. In the dilute mode of operation, unborated demineralized water may be supplied directly to the reactor coolant system.

Although the CVS is not considered a safety related system, certain functions of the system are considered safety related functions. The appropriate components have been classified and designed as safety related. The safety related functions provided by the CVS include containment isolation of chemical and volume control system lines penetrating containment, termination of inadvertent boron dilution, and preservation of the Reactor Coolant System (RCS) pressure boundary, including isolation of CVS letdown from the RCS.

APPLICABLE SAFETY ANALYSES

One of the initial assumptions in the analysis of an inadvertent boron dilution event (Ref. 1) is the assumption that the increase in core reactivity, created by the dilution event, can be detected by the source range instrumentation. The source range instrumentation will then supply a signal to the demineralized water isolation valves in the CVS causing these valves to close and terminate the boron dilution event. Thus the demineralized water isolation valves are components which function to mitigate an AOO.

CVS isolation valves satisfy Criterion 3 of the NRC Policy Statement.

LCO

The requirement that at least two demineralized water isolation valves be OPERABLE assures that there will be redundant means available to terminate an inadvertent boron dilution event.

(continued)

BASES (continued)

APPLICABILITY

The requirement that at least two demineralized water isolation valves be OPERABLE is applicable in MODES 1, 2, 3, 4, and 5 because a boron dilution event is considered possible in these MODES, and the automatic closure of these valves is assumed in the safety analysis.

In MODES 1 and 2, the detection and mitigation of a boron dilution event does not assume the detection of the event by the source range instrumentation. In these MODES, the event would be signalled by an intermediate range trip, a trip on the Power Range Neutron Flux - High (low setpoint nominally at 25% RTP), or Overtemperature delta T. The two demineralized water isolation valves close automatically upon reactor trip.

In MODE 6, a dilution event is precluded by the requirement in LCO 3.9.2 to close, lock and secure at least one valve in each unborated water source flow path.

ACTIONS

A.1

If only one demineralized water isolation valve is OPERABLE, the second valve must be restored to OPERABLE status in 72 hours. The allowed Completion Time assures expeditious action will be taken, and is acceptable because the safety function of automatically isolating the clean water source can be accomplished by the redundant isolation valve.

B.1

If the Required Actions and associated Completion Time of Condition A are not met, or if both CVS demineralized water isolation valves are not OPERABLE (i.e., not able to be closed automatically), then the demineralized water supply flow path to the RCS must be isolated. Isolation can be accomplished by manually isolating the CVS demineralized water isolation valve(s) or by positioning the 3-way blend valve to only take suction from the boric acid tank. Alternatively, the dilution path may be isolated by closing appropriate isolation valve(s) in the flow path(s) from the demineralized water storage tank to the reactor coolant system.

(continued)

BASES

ACTIONS

B.1 (continued)

The Action is modified by a Note allowing the flow path to be unisolated intermittently under administrative controls. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the main control room. In this way, the flow path can be rapidly isolated when a need for isolation is indicated.

SURVEILLANCE REQUIREMENTS

SR 3.1.9.1

Verification that the CVS demineralized water isolation valves are OPERABLE, by stroking each valve closed, demonstrates that the valves can perform their safety related function. The Frequency is in accordance with the Inservice Testing Program.

REFERENCES

1. Chapter 15, "Accident Analysis."

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.1 Heat Flux Hot Channel Factor ($F_Q(Z)$) (F_Q Methodology)

BASES

BACKGROUND

The purpose of the limits on the values of $F_Q(Z)$ is to limit the local (i.e., pellet) peak power density. The value of $F_Q(Z)$ varies along the axial height (Z) of the core.

$F_Q(Z)$ is defined as the maximum local fuel rod linear power density divided by the average fuel rod linear power density, assuming nominal fuel pellet and fuel rod dimensions. Therefore, $F_Q(Z)$ is a measure of the peak fuel pellet power within the reactor core.

During power operation with the On-line Power Distribution Monitoring System (OPDMS) inoperable, the global power distribution is limited by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," which are directly and continuously measured process variables. These LCOs along with LCO 3.1.6, "Control Bank Insertion Limits," maintain the core limits on power distributions on a continuous basis.

$F_Q(Z)$ varies with fuel loading patterns, control bank insertion, fuel burnup, and changes in axial power distribution.

With the OPDMS OPERABLE, peak kw/ft (Z) (which is proportional to $F_Q(Z)$) is measured continuously. With the OPDMS inoperable, $F_Q(Z)$ is measured periodically using the incore detector system. These measurements are generally taken with the core at or near steady state conditions.

With the measured three dimensional power distributions, it is possible to derive a measured value for $F_Q(Z)$ with the OPDMS inoperable. However, because this value represents a steady state condition, it does not include the variations in the value of $F_Q(Z)$ which are present during a nonequilibrium situation such as load following.

To account for these possible variations, the steady state value of $F_Q(Z)$ is adjusted by an elevation dependent factor to account for the calculated worst case transient conditions.

(continued)

BASES

BACKGROUND (continued)	Core monitoring and control under nonsteady state conditions and the OPDMS inoperable are accomplished by operating the core within the limits of the appropriate LCOs, including the limits on AFD, QPTR, and control rod insertion.

APPLICABLE SAFETY ANALYSES

This LCO precludes core power distributions that violate the following fuel design criteria:

a. During a large break loss of coolant accident (LOCA), the peak cladding temperature must not exceed a limit of 2200°F (Ref. 1);

b. During a loss of forced reactor coolant flow accident, there must be at least a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hot fuel rod in the core does not experience a departure from nucleate boiling (DNB) condition;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 280 cal/gm (Ref. 2); and

d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn (Ref. 3).

Limits on $F_Q(Z)$ ensure that the value of the initial total peaking factor assumed in the accident analyses remains valid. Other criteria must also be met (e.g., maximum cladding oxidation, maximum hydrogen generation, coolable geometry, and long term cooling). However, the peak cladding temperature is typically most limiting.

$F_Q(Z)$ limits assumed in the LOCA analysis are typically limiting (i.e., lower than) relative to the $F_Q(Z)$ assumed in safety analyses for other postulated accidents. Therefore, this LCO provides conservative limits for other postulated accidents.

$F_Q(Z)$ satisfies Criterion 2 of the NRC Policy Statement.

(continued)

BASES (continued)

LCO

The Heat Flux Hot Channel Factor, $F_Q(Z)$, shall be limited by the following relationships:

$$F_Q(Z) \leq \frac{CFQ}{P} \qquad \text{for } P > 0.5$$

$$F_Q(Z) \leq \frac{CFQ}{0.5} \qquad \text{for } P \leq 0.5$$

where: CFQ is the $F_Q(Z)$ limit at RTP provided in the COLR,

$$P = \frac{\text{THERMAL POWER}}{\text{RTP}}$$

The actual values of CFQ are given in the COLR; however, CFQ is normally a number on the order of [2.60]. For the AP600, the normalized $F_Q(Z)$ as a function of core height is 1.0.

For RAOC operation, $F_Q(Z)$ is approximated by $F_Q^C(Z)$ and $F_Q^W(Z)$. Thus, both $F_Q^C(Z)$ and $F_Q^W(Z)$ must meet the preceding limits on $F_Q(Z)$.

An $F_Q^C(Z)$ evaluation requires obtaining an incore flux map in MODE 1. From the incore flux map results the measured value of $F_Q(Z)$, called $F_Q^M(Z)$ is obtained. Then,

$$F_Q^C(Z) = F_Q^M(Z) * F_Q^{MU}$$

where F_Q^{MU} is a factor that accounts for fuel manufacturing tolerances and flux map measurement uncertainty. F_Q^{MU} is provided in the COLR.

$F_Q^C(Z)$ is an excellent approximation for $F_Q(Z)$ when the reactor is at the steady state power at which the incore flux map was taken.

The expression for $F_Q^W(Z)$ is:

$$F_Q^W(Z) = F_Q^C(Z) * W(Z)$$

where W(Z) is a cycle-dependent function that accounts for power distribution transients encountered during normal operation. W(Z) is included in the COLR.

(continued)

BASES

LCO (continued)	The $F_Q(Z)$ limits define limiting values for core power peaking that precludes peak cladding temperatures above 2200°F during either a large or small break LOCA. This LCO requires operation within the bounds assumed in the safety analyses. Calculations are performed in the core design process to confirm that the core can be controlled in such a manner during operation that it can stay within the LOCA $F_Q(Z)$ limits. If $F_Q(Z)$ cannot be maintained within the LCO limits, reduction of the core power is required. Violating the LCO limits for $F_Q(Z)$ may result in an unanalyzed condition while $F_Q(Z)$ is outside its specified limits.
APPLICABILITY	When the OPDMS is inoperable and core power distribution parameters cannot be continuously monitored, it is necessary to determine $F_Q(Z)$ on a periodic basis. Furthermore, the $F_Q(Z)$ limits must be maintained in MODE 1 to prevent core power distributions from exceeding the limits assumed in the safety analyses. Applicability in other MODES is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require a limit on the distribution of core power.
ACTIONS	<u>A.1</u> Reducing THERMAL POWER by $\geq$ 1% of RTP for each 1% by which $F_Q^C(Z)$ exceeds its limit, maintains an acceptable absolute power density. $F_Q^C(Z)$ is $F_Q^M(Z)$ multiplied by a factor accounting for fuel manufacturing tolerances and flux map measurement uncertainties. $F_Q^M(Z)$ is the measured value of $F_Q(Z)$. The Completion Time of 15 minutes provides an acceptable time to reduce power in an orderly manner without allowing the plant to remain outside the $F_Q^C(Z)$ limit for an extended period of time.

(continued)

BASES

ACTIONS (continued)

A.2

A reduction of the Power Range Neutron Flux - High Trip setpoints by $\geq$ 1% for each 1% by which $F_Q^C(Z)$ exceeds its limit is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 8 hours is sufficient considering the small likelihood of a severe transient in this time period and the prompt reduction in THERMAL POWER in accordance with Required Action A.1.

A.3

Reduction in the Overpower ΔT Trip setpoints by $\geq$ 1% for each 1% by which $F_Q^C(Z)$ exceeds its limit is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions. The Completion Time of 72 hours is sufficient considering the small likelihood of a severe transient in this time period and the prompt reduction in THERMAL POWER in accordance with Required Action A.1.

A.4

Verification that $F_Q^C(Z)$ has been restored to within its limit by performing SR 3.2.1.1 prior to increasing THERMAL POWER above the limit imposed by Required Action A.1, assures that core conditions during operation at higher power levels are consistent with safety analyses assumptions.

B.1

If it is found that the maximum calculated value of $F_Q(Z)$ which can occur during normal maneuvers, $F_Q^W(Z)$, exceeds its specified limits, there exists a potential for $F_Q^C(Z)$ to become excessively high if a normal operational transient occurs. Reducing the AFD by $\geq$ 1% for each 1% by which $F_Q^W(Z)$ exceeds its limit within the allowed Completion Time of 2 hours restricts the axial flux distribution such that even if a transient occurred, core peaking factors would not be exceeded.

(continued)

BASES

ACTIONS (continued)

C.1

If Required Actions A.1 through A.4 or B.1 cannot be met within their associated Completion Times, the plant must be placed in a MODE or condition in which the LCO requirements are not applicable. This is done by placing the plant in at least MODE 2 within 6 hours.

This allowed Completion Time is reasonable based on operating experience regarding the amount of time it takes to reach MODE 2 from full power operation in an orderly manner without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.2.1.1 and SR 3.2.1.2 are modified by three Notes. The first two notes apply to the situation where the OPDMS is inoperable at the beginning of cycle startup. Note 1 applies during the first power ascension after a refueling. It states that THERMAL POWER may be increased until an equilibrium power level has been achieved at which a power distribution map can be obtained. This allowance is modified, however, by one of the Frequency conditions that requires verification that $F_Q^C(Z)$ and $F_Q^W(Z)$ are within their specified limits after a power rise of more than 10% of RTP over the THERMAL POWER at which they were last verified to be within specified limits. Because $F_Q^C(Z)$ and $F_Q^W(Z)$ could not have previously been measured in this reload core, there is a second Frequency condition, applicable for reload cores, that allows a first power ascension after a refueling up to 75% of RTP before the first determination of $F_Q^C(Z)$ is required.

The second Note states that SR 3.2.1.1 and SR 3.2.1.2 are not required to be performed prior to entry into MODE 1 because the plant must be in MODE 1 before the surveillance can be performed.

The third Note applies to the situation where the OPDMS becomes inoperable while the plant is in MODE 1. Without the continuous monitoring capability of the OPDMS, F_Q limits must be monitored on a periodic basis. The first measurement must be made within 31 days of the most recent date where the OPDMS data has verified peak kw/ft (Z) (and therefore also F_Q) to be within its limit. This is consistent with the 31 day Surveillance Frequency.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.2.1.1

Verification that $F_Q^C(Z)$ is within its specified limits involves increasing the measured values of $F_Q^C(Z)$ (i.e., $F_Q^M(Z)$) to allow for manufacturing tolerance and measurement uncertainties in order to obtain $F_Q^C(Z)$. Specifically, $F_Q^M(Z)$ = the measured value of $F_Q(Z)$ obtained from incore flux map results and $F_Q^C(Z) = F_Q^M(Z) * F^{MU}_Q$. $F_Q^C(Z)$ is then compared to its specified limits.

The limit to which $F_Q^C(Z)$ is compared varies inversely with power above 50% RTP.

Performing the Surveillance in MODE 1 prior to exceeding 75% RTP assures that the $F_Q^C(Z)$ limit will be met when RTP is achieved because Peaking Factors generally decrease as power level is increased.

If THERMAL POWER has been increased by ≥ 10% RTP since the last determination of $F_Q^C(Z)$, another evaluation of this factor is required 12 hours after achieving equilibrium conditions at this higher power level (to assure that $F_Q^C(Z)$ values are being reduced sufficiently with power increase to stay within the LCO limits).

The Frequency of 31 effective full power days (EFPDs) is adequate for monitoring the change of power distribution with core burnup because such changes are slow and well controlled when the plant is operated in accordance with Technical Specifications.

SR 3.2.1.2

The nuclear design process includes calculations which are performed to determine that the core can be operated within the $F_Q(Z)$ limits. Because flux maps are taken in steady state conditions, the variations in power distribution resulting from normal operational maneuvers are not present in the flux map data. These variations are, however, conservatively calculated by considering a wide range of unit maneuvers in normal operation. The maximum peaking factor increase over steady state values, calculated as a function of core elevation, Z, is called W(Z). Multiplying the measured total peaking factor, $F_Q^C(Z)$, by W(Z) gives the maximum $F_Q(Z)$ calculated to occur in normal operation, $F_Q^W(Z)$.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.1.2 (continued)

The limit to which $F_Q^W(Z)$ is compared varies inversely with power.

The W(Z) curve is provided in the COLR for discrete core elevations. $F_Q^W(Z)$ evaluations are not applicable for the following axial core regions, measured in percent of core height:

a. Lower core region, from 0% to 15% inclusive; and

b. Upper core region, from 85% to 100% inclusive.

The top and bottom 15% of the core are excluded from the evaluation because of the difficulty of making a precise measurement in these regions and because of the low probability that these regions would be more limiting than the safety analyses.

This Surveillance has been modified by a Note, which may require that more frequent surveillances be performed. If $F_Q^W(Z)$ is evaluated and found to be within its limit, an evaluation of the expression below is required to account for any increase to $F_Q^M(Z)$ which could occur and cause the $F_Q(Z)$ limit to be exceeded before the next required $F_Q(Z)$ evaluation. If the two most recent $F_Q(Z)$ evaluations show an increase in $F_Q^C(Z)$, it is required to meet the $F_Q(Z)$ limit with the last $F_Q^W(Z)$ increased by a factor of [1.02] or to evaluate $F_Q(Z)$ more frequently, each 7 EFPDs. These alternative requirements will prevent $F_Q(Z)$ from exceeding its limit for any significant period of time without detection.

Performing the Surveillance in MODE 1 prior to exceeding 75% of RTP ensures that the $F_Q(Z)$ limit will be met when RTP is achieved, because peaking factors are generally decreased as power level is increased.

The Surveillance Frequency of 31 EFPDs is adequate to monitor the change of power distribution because such a change is sufficiently slow, when the plant is operated in accordance with Technical Specifications, to preclude the occurrence of adverse peaking factors between 31 EFPD Surveillances. The Surveillance may be done more frequently if required by the results of $F_Q(Z)$ evaluations.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.1.2 (continued)

$F_Q(Z)$ is verified at power increases of at least 10% RTP above the THERMAL POWER of its last verification, 12 hours after achieving equilibrium conditions, to assure that $F_Q(Z)$ will be within its limit at higher power levels.

REFERENCES

1. 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors," 1974.

2. Regulatory Guide 1.77, Rev. 0, "Assumptions Used for Evaluating a Control Rod Ejection Accident for Pressurized Water Reactors," May 1974.

3. 10 CFR 50, Appendix A, GDC 26.

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)

BASES

BACKGROUND

The purpose of this LCO is to establish limits on the power density at any point in the core so that the fuel design criteria are not exceeded and the accident analysis assumptions remain valid. The design limits on local (pellet) and integrated fuel rod peak power density are expressed in terms of hot channel factors. Control of the core power distribution with respect to these factors assures that local conditions in the fuel rods and coolant channels do not challenge core integrity at any location during either normal operation or a postulated accident analyzed in the safety analyses.

$F^N_{\Delta H}$ is defined as the ratio of the integral of the linear power along the fuel rod with the highest integrated power to the average integrated fuel rod power. Therefore, $F^N_{\Delta H}$ is a measure of the maximum total power produced in a fuel rod.

$F^N_{\Delta H}$ is sensitive to fuel loading patterns, bank insertion and fuel burnup. $F^N_{\Delta H}$ typically increases with control bank insertion and typically decreases with fuel burnup.

With the On-line Power Distribution Monitoring System (OPDMS) OPERABLE, $F^N_{\Delta H}$ is determined continuously by the OPDMS. When the OPDMS is inoperable, $F^N_{\Delta H}$ is not directly measurable but is inferred from a power distribution map obtained with the incore detector system. Specifically, the results of the three dimensional power distribution map are analyzed to determine $F^N_{\Delta H}$. This factor is calculated at least every 31 effective full power days (EFPDs). Also, during power operation with the OPDMS inoperable, the global power distribution is monitored by LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," and LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," which are directly and continuously measured process variables.

The COLR provides peaking factor limits that ensure that the design basis value of the departure from nucleate boiling (DNB) is met for normal operation, operational transients,

(continued)

BASES

BACKGROUND (continued)

and any transient condition arising from events of moderate frequency. The DNB design basis precludes DNB and is met by limiting the minimum local DNB heat flux ratio. Transient events that may be DNB limited are assumed to begin with a $F^N_{\Delta H}$ that satisfies the LCO requirements.

Operation outside the LCO limits may produce unacceptable consequences if a DNB limiting event occurs. The DNB design basis ensures that there is no overheating of the fuel that results in possible cladding perforation with the release of fission products to the reactor coolant.

APPLICABLE SAFETY ANALYSES

Limits on $F^N_{\Delta H}$ prevent core power distributions from occurring which would exceed the following fuel design limits:

a. There must be at least a 95% probability at a 95% confidence level (the 95/95 DNB criterion) that the hottest fuel rod in the core does not experience a DNB condition;

b. During a large break loss of coolant accident (LOCA), the peak cladding temperature (PCT) must not exceed 2200°F;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 280 cal/gm (Ref. 1); and

d. Fuel design limits required by GDC 26 (Ref. 2) for the condition when the control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn.

For transients that may be DNB limited, the Reactor Coolant System (RCS) flow and $F^N_{\Delta H}$ are the core parameters of most importance. The limits on $F^N_{\Delta H}$ ensure that the DNB design basis is met for normal operation, operational transients, and any transients arising from events of moderate frequency. The DNB design basis is met by limiting the minimum DNB ratio (DNBR) to the 95/95 DNB criterion. This value provides a high degree of assurance that the hottest fuel rod in the core will not experience a DNB.

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The allowable $F^N_{\Delta H}$ limit increases with decreasing power level. This functionality in $F^N_{\Delta H}$ is included in the analyses that provide the Reactor Core Safety Limits (SLs) of SL 2.1.1. Therefore, any DNB events in which the calculation of the core limits is modeled implicitly use this variable value of $F^N_{\Delta H}$ in the analyses. Likewise, all transients that may be DNB limited are assumed to begin with an initial $F^N_{\Delta H}$ as a function of power level defined by the COLR limit equation.

The LOCA safety analysis indirectly models $F^N_{\Delta H}$ as an input parameter. The Nuclear Heat Flux Hot Channel Factor ($F_Q(Z)$) and the axial peaking factors are inserted directly into the LOCA safety analyses that verify the acceptability of the resulting peak cladding temperature (Ref. 3).

The fuel is protected in part by Technical Specifications, which provide assurance that the initial conditions assumed in the safety and accident analyses remain valid. With the OPDMS OPERABLE, peak kw/ft(Z) and $F^N_{\Delta H}$ are directly monitored. Should the OPDMS become inoperable, the following LCOs assure that the conditions assumed for the safety analysis remain valid: LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," LCO 3.1.6, "Control Bank Insertion Limits," LCO 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)," and LCO 3.2.1, "Heat Flux Hot Channel Factor ($F_Q(Z)$)."

When the OPDMS is not available to measure power distribution parameters continuously, $F^N_{\Delta H}$ and $F_Q(Z)$ are measured periodically using the incore detector system. Measurements are generally taken with the core at, or near, steady-state conditions. Without the OPDMS, core monitoring and control under transient conditions (Condition 1 events) are accomplished by operating the core within the limits of the LCOs on AFD, QPTR, and Bank Insertion Limits.

$F^N_{\Delta H}$ satisfies Criterion 2 of the NRC Policy statement.

(continued)

BASES (continued)

LCO

$F^N_{\Delta H}$ shall be maintained within the limits of the relationship provided in the COLR.

The $F^N_{\Delta H}$ limit identifies the coolant flow channel with the maximum enthalpy rise. This channel has the least heat removal capability and thus the highest probability for a DNB.

The limiting value of $F^N_{\Delta H}$, described by the equation contained in the COLR, is the design radial peaking factor used in the unit safety analyses.

A power multiplication factor in this equation includes an additional margin for higher radial peaking from reduced thermal feedback and greater control rod insertion at low power levels. The limiting value of $F^N_{\Delta H}$ is allowed to increase [0.3%] for every 1% RTP reduction in THERMAL POWER.

APPLICABILITY

When the OPDMS is inoperable and core power distribution parameters cannot be continuously monitored, it is necessary to monitor $F^N_{\Delta H}(Z)$ on a periodic basis. Furthermore, $F^N_{\Delta H}$ limits must be maintained in MODE 1 to preclude core power distributions from exceeding the fuel design limits for DNBR and peak cladding temperature PCT. Applicability in other modes is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the coolant to require a limit on the distribution of core power. Specifically, the design bases events that are sensitive to $F^N_{\Delta H}$ in other modes (MODES 2 through 5) have significant margin to DNB, and therefore, there is no need to restrict $F^N_{\Delta H}$ in these modes.

ACTIONS

A.1.1

With $F^N_{\Delta H}$ exceeding its limit, the unit is allowed 4 hours to restore $F^N_{\Delta H}$ to within its limits. This restoration may, for example, involve realigning any misaligned rods or reducing power enough to bring $F^N_{\Delta H}$ within its power-dependent limit.

(continued)

BASES

ACTIONS

A.1.1 (continued)

When the $F^N_{\Delta H}$ limit is exceeded, it is not likely that the DNBR limit would be violated in steady state operation, since events that could significantly perturb the $F^N_{\Delta H}$ value (e.g., static control rod misalignment) are considered in the safety analyses. However, the DNBR limit may be violated if a DNB limiting event occurs. Thus, the allowed Completion Time of 4 hours provides an acceptable time to restore $F^N_{\Delta H}$ to within its limits without allowing the plant to remain outside $F^N_{\Delta H}$ limits for an extended period of time.

Condition A is modified by a Note that requires that Required Actions A.2 and A.3 must be completed whenever Condition A is entered. Thus, if power is not reduced because this Required Action is completed within the 4 hour time period, Required Action A.2 would nevertheless require another measurement and calculation of $F^N_{\Delta H}$ within 24 hours in accordance with SR 3.2.2.1.

However, if power were reduced below 50% RTP, Required Action A.3 requires that another determination of $F^N_{\Delta H}$ must be done prior to exceeding 50% RTP, prior to exceeding 75% RTP, and within 24 hours after reaching or exceeding 95% RTP. In addition, Required Action A.2 would be performed if power ascension were delayed past 24 hours.

A.1.2.1 and A.1.2.2

If the value of $F^N_{\Delta H}$ is not restored to within its specified limit either by adjusting a misaligned rod or by reducing THERMAL POWER, the alternative option is to reduce THERMAL POWER to < 50% RTP in accordance with Required Action A.1.2.1 and reduce the Power Range Neutron Flux - High to ≤ 55% RTP in accordance with Required Action A.1.2.2. The reduction in trip setpoints ensures that continuing operation remains at an acceptable low power level with adequate DNBR margin. The allowed Completion Time of 4 hours for Required Action A.1.2.1 is consistent with those specified in Required Action A.1.1 and provides an acceptable time to reach the required power level from full power operation without allowing the plant to remain in an unacceptable condition for an extended period of time. The Completion Time of 4 hours for Required Actions A.1.1 and A.1.2.1 are not additive.

(continued)

BASES

ACTIONS

A.1.2.1 and A.1.2.2 (continued)

The allowed Completion Time of 8 hours to reset the trip setpoints per Required Action A.1.2.2 recognizes that, once power is reduced, the safety analysis assumptions are satisfied and there is no urgent need to reduce the trip setpoints. This is a sensitive operation that may cause an inadvertent reactor trip.

A.2

Once the power level has been reduced to < 50% RTP per Required Action A.1.2.1, an incore flux map (SR 3.2.2.1) must be obtained and the measured value of $F^N_{\Delta H}$ verified not to exceed the allowed limit at the lower power level. The unit is provided 16 additional hours to perform this task over and above the 8 hours allowed by either Action A.1.1 or Action A.1.2.1. The Completion Time of 24 hours is acceptable because of the increase in the DNB margin, which is obtained at lower power levels, and the low probability of having a DNB limiting event within this 24 hour period. Additionally, operating experience has indicated that this Completion Time is sufficient to obtain the incore flux map, perform the required calculations, and evaluate $F^N_{\Delta H}$.

A.3

Verification that $F^N_{\Delta H}$ is within its specified limits after an out of limit occurrence assures that the cause that led to the $F^N_{\Delta H}$ exceeding its limit is corrected, and that subsequent operation will proceed within the LCO limit. This Action demonstrates that the $F^N_{\Delta H}$ limit is within the LCO limits prior to exceeding 50% of RTP, again prior to exceeding 75% RTP, and within 24 hours after THERMAL POWER is ≥ 95% RTP.

This Required Action is modified by a Note, that states that THERMAL POWER does not have to be reduced prior to performing this action.

(continued)

BASES

ACTIONS (continued)	B.1 When Required Actions A.1.1 through A.3 cannot be completed within their required Completion Times, the plant must be placed in a mode in which the LCO requirements are not applicable. This is done by placing the plant in at least MODE 2 within 6 hours. The allowed Completion Time of 8 hours is reasonable, based on operating experience regarding the time required to reach MODE 2 from full power conditions in an orderly manner without challenging plant systems.
SURVEILLANCE REQUIREMENTS	SR 3.2.2.1 When the OPDMS is OPERABLE, the value of $F^N_{\Delta H}$ is directly and continuously monitored. With the OPDMS inoperable, the value of $F^N_{\Delta H}$ is determined by using the incore detector system to obtain a flux distribution map. A data reduction computer program then calculates the maximum value of $F^N_{\Delta H}$ from the measured flux distributions. The measured value of $F^N_{\Delta H}$ must be multiplied by a measurement uncertainty factor before making comparisons to the $F^N_{\Delta H}$ limit. After each refueling, with the OPDMS inoperable, $F^N_{\Delta H}$ must be determined prior to exceeding 75% RTP. This requirement ensures that $F^N_{\Delta H}$ limits are met at the beginning of each fuel cycle. With the OPDMS inoperable, the 31 EFPDs Frequency is acceptable because the power distribution will change relatively slowly over this amount of fuel burnup. This Frequency is short enough so that the $F^N_{\Delta H}$ limit will not be exceeded for any significant period of operation.
REFERENCES	1. Regulatory Guide 1.77, Rev. 0, May 1979. 2. 10 CFR 50, Appendix A, GDC 26. 3. 10 CFR 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors."

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.3 AXIAL FLUX DIFFERENCE (AFD) (Relaxed Axial Offset Control (RAOC) Methodology)

BASES

BACKGROUND

The purpose of this LCO is to establish limits on the values of the AFD in order to limit the amount of axial power distribution skewing to either the top or bottom of the core when the On-Line Power Distribution Monitoring System (OPDMS) is inoperable. By limiting the amount of power distribution skewing, core peaking factors are consistent with the assumptions used in the safety analyses. Limiting power distribution skewing over time also minimizes the xenon distribution skewing which is a significant factor in axial power distribution control.

RAOC is a calculational procedure which defines the allowed operational space of the AFD versus THERMAL POWER. The AFD limits are selected by considering a range of axial xenon distributions that may occur as a result of large variations of the AFD. Subsequently, power peaking factors and power distributions are examined to assure that the loss of coolant accident (LOCA), loss of flow accident, and anticipated transient limits are met. Violation of the AFD limits invalidate the conclusions of the accident and transient analyses with regard to fuel cladding integrity.

Although the RAOC defines limits that must be met to satisfy safety analyses, typically, without the OPDMS, an operating scheme, Constant Axial Offset Control (CAOC), is used to control axial power distribution in day-to-day operation (Ref. 1). CAOC requires that the AFD be controlled within a narrow tolerance band around a burnup-dependent target to minimize the variation of axial peaking factors and axial xenon distribution during unit maneuvers.

The CAOC operating space is typically smaller and lies within the RAOC operating space. Control within the CAOC operating space constrains the variation of axial xenon distributions and axial power distributions. RAOC calculations assume a wide range of xenon distributions and then confirm that the resulting power distributions satisfy the requirements of the accident analyses.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The AFD is a measure of the axial power distribution skewing to either the top or bottom half of the core. The AFD is sensitive to many core related parameters such as control bank positions, core power level, axial burnup, axial xenon distribution, and, to a lesser extent, reactor coolant temperature and boron concentration.

The allowed range of the AFD is used in the nuclear design process to confirm that operation within these limits produces core peaking factors and axial power distributions that meet safety analysis requirements.

Three dimensional power distribution calculations are performed to demonstrate that normal operation power shapes are acceptable for the LOCA, the loss of flow accident, and for initial conditions of anticipated transients. The tentative limits are adjusted as necessary to meet the safety analysis requirements.

With the OPDMS inoperable, the limits on the AFD ensure that the Heat Flux Hot Channel Factor ($F_Q(Z)$) is not exceeded during either normal operation or in the event of xenon redistribution following power changes. The limits on the AFD also restrict the range of power distributions that are used as initial conditions in the analyses of Condition 2, 3, or 4 events. This ensures that the fuel cladding integrity is maintained for these postulated accidents. The most important Condition 4 event is the LOCA. The most important Condition 3 event is the loss of flow accident. The most important Condition 2 events are uncontrolled bank withdrawal and boration or dilution accidents. Condition 2 accidents simulated to begin from within the AFD limits are used to confirm the adequacy of the Overpower ΔT and Overtemperature ΔT trip setpoints.

The limits on the AFD satisfy Criterion 2 of the NRC Policy Statement.

LCO

The shape of the power profile in the axial (i.e., the vertical) direction is largely under the control of the operator through the manual operation of the control banks or automatic motion of control banks. The automatic motion

(continued)

BASES

LCO (continued)

of the control banks is in response to temperature deviations resulting from manual operation of the Chemical and Volume Control System (CVS) to change boron concentration or from power level changes.

Signals are available to the operator from the Protection and Safety Monitoring System (PMS) excore neutron detectors (Ref. 3). Separate signals are taken from the top and bottom detectors. The AFD is defined as the difference in normalized flux signals between the top and bottom excore detectors in each detector well. For convenience, this flux difference is converted to provide flux difference units expressed as a percentage and labeled as %Δ flux or %ΔI.

The AFD limits are provided in the COLR. Figure B 3.2.3-1 shows typical RAOC AFD limits. The AFD limits for RAOC do not depend on the target flux difference. However, the target flux difference may be used to minimize changes in the axial power distribution.

Violating this LCO on the AFD, with the OPDMS inoperable, could produce unacceptable consequences if a Condition 2, 3 or 4 event occurs while the AFD is outside its specified limits.

APPLICABILITY

The AFD requirements are applicable in MODE 1 greater than or equal to 50% RTP where the combination of THERMAL POWER and core peaking factors are of primary importance in safety analysis.

For AFD limits developed using RAOC methodology, the value of the AFD does not affect the limiting accident consequences with THERMAL POWER < 50% RTP and for lower operating power MODES. With the OPDMS inoperable, it is necessary to monitor AFD via the excore detectors to ensure that it remains within the RAOC limits.

ACTIONS

A.1

Required Action A.1 requires a THERMAL POWER reduction to < 50% RTP. This places the core in a condition where the

(continued)

BASES

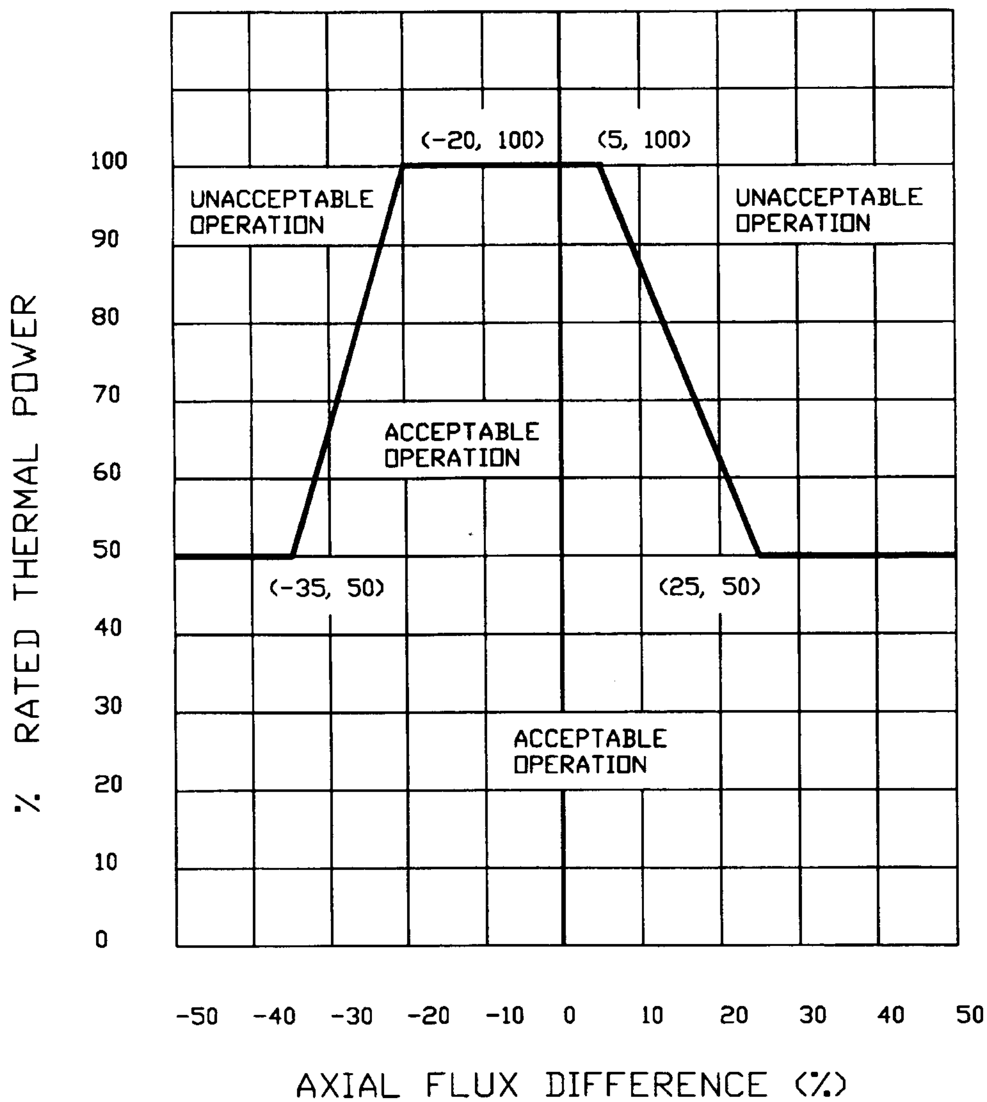

Figure B 3.2.3-1 (Page 1 of 1)

Axial Flux Difference Limits as a Function of RATED THERMAL POWER

(continued)

BASES

ACTIONS

A.1 (continued)

value of the AFD is not important in the applicable safety analyses. A Completion Time of 30 minutes is reasonable, based on operating experience, to reach 50% RTP without challenging plant systems.

SURVEILLANCE REQUIREMENTS

SR 3.2.3.1

The AFD is monitored on an automatic basis using the computer which has an AFD monitor alarm. The computer determines the 1 minute average of each of the OPERABLE excore detector outputs and provides an alarm message immediately if the AFD for two or more OPERABLE excore channels is outside its specified limits.

This surveillance verifies that the AFD, as indicated by the PMS excore channel, is within its specified limits and consistent with the status of the AFD monitor alarm. With the AFD monitor alarm inoperable, the AFD is monitored every hour to detect operation outside its limit. The Frequency of 1 hour is based on operating experience regarding the amount of time required to vary the AFD, and the fact that the AFD is closely monitored. With the AFD monitor alarm OPERABLE, the Surveillance Frequency of 7 days is adequate considering that the AFD is monitored by a computer and any deviation from requirements is alarmed.

REFERENCES

1. WCAP-8403, "Power Distribution Control and Load Following Procedures," Westinghouse Electric Corporation, September 1974.

2. R.W. Miller et al., "Relaxation of Constant Axial Offset Control: F_Q Surveillance Technical Specification," WCAP-10217, June 1983.

3. Chapter 15, "Accident Analysis."

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.4 QUADRANT POWER TILT RATIO (QPTR)

BASES

BACKGROUND

With the OPDMS inoperable, the QPTR limit ensures that the gross radial power distribution remains consistent with the design values used in the safety analyses. Precise radial power distribution measurements are made during startup testing, after refueling, and periodically during power operation.

The power density at any point in the core must be limited so that the fuel design criteria are maintained. With the OPDMS OPERABLE, the peak kw/ft(Z) is continuously and directly monitored. With the OPDMS inoperable, LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD)," LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)," and LCO 3.1.6, "Control Rod Insertion Limits," provide limits on process variables that characterize and control the three dimensional power distribution of the reactor core. Control of these variables ensures that the core operates within the fuel design criteria and that the power distribution remains within the bounds used in the safety analyses.

APPLICABLE SAFETY ANALYSES

This LCO precludes core power distributions from occurring which would violate the following fuel design criteria:

a. During a large break loss of coolant accident (LOCA), the peak cladding temperature (PCT) must not exceed 2200°F (Ref. 1);

b. During a loss of forced reactor coolant flow accident, there must be at least a 95% probability at a 95% confidence level (the 95/95 departure from nucleate boiling (DNB) criterion) that the hot fuel rod in the core does not experience a DNB condition;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 280 cal/gm (Ref. 2); and

d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn (Ref. 3).

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

The LCO limits on the AFD, the QPTR, the Heat Flux Hot Channel Factor ($F_Q(Z)$), the Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$), and control bank insertion are established to preclude core power distributions from occurring which would exceed the safety analyses limits.

Should the OPDMS become inoperable, the QPTR limits ensure that $F^N_{\Delta H}$ and $F_Q(Z)$ remain below their limiting values by preventing an undetected change in the gross radial power distribution.

In MODE 1, with the OPDMS inoperable, the $F^N_{\Delta H}$ and $F_Q(Z)$ limits must be maintained to preclude core power distributions from exceeding design limits assumed in the safety analyses.

The QPTR satisfies Criterion 2 of the NRC Policy Statement.

LCO

The QPTR limit of 1.02, where corrective action is required, provides a margin of protection for both the DNB ratio (DNBR) and linear heat generation rate contributing to excessive power peaks resulting from X-Y plane power tilts. A limiting QPTR of 1.02 can be tolerated before the margin for uncertainty in $F_Q(Z)$ and $F^N_{\Delta H}$ is possibly challenged.

APPLICABILITY

The QPTR limit must be maintained in MODE 1 with THERMAL POWER > 50% RTP to preclude core power distributions from exceeding the design limits. With the OPDMS inoperable, a continuous on-line indication of core peaking factors is not available. Therefore, QPTR must be monitored and the limits on QPTR ensure that peaking factors will be within design limits.

Applicability in MODE 1 ≤ 50% RTP and in other MODES is not required because there is either insufficient stored energy in the fuel or insufficient energy being transferred to the reactor coolant to require the implementation of a QPTR limit on the distribution of core power. The QPTR limit in these conditions is, therefore, not important. Note that the $F^N_{\Delta H}$ and $F_Q(Z)$ LCOs still apply, but allow progressively higher peaking factors at 50% RTP or lower.

(continued)

BASES (continued)

ACTIONS

A.1

With the QPTR exceeding its limit, and the OPDMS inoperable, a power level reduction of 3% RTP for each 1% by which the QPTR exceeds 1.00 is a conservative tradeoff of total core power with peak linear power. The Completion Time of 2 hours allows sufficient time to identify the cause and correct the tilt. Note that the power reduction itself may cause a change in the tilted condition.

A.2

After completion of Required Action A.1, the QPTR alarm may be in its alarmed state. As such, any additional changes in the QPTR are detected by requiring a check of the QPTR once per 12 hours thereafter. If the QPTR continues to increase, THERMAL POWER has to be reduced accordingly. A 12 hour Completion Time is sufficient because any additional change in QPTR would be relatively slow.

A.3

The peaking factors $F^N_{\Delta H}$ and $F_Q(Z)$ are of primary importance in assuring that the power distribution remains consistent with the initial conditions used in the safety analyses. Performing SRs on $F^N_{\Delta H}$ and $F_Q(Z)$ within the Completion Time of 24 hours ensures that these primary indicators of power distribution are within their respective limits. A Completion Time of 24 hours takes into consideration the rate at which peaking factors are likely to change, and the time required to stabilize the plant and perform a flux map. If these peaking factors are not within their limits, the Required Actions of these Surveillances provide an appropriate response for the abnormal condition. If the QPTR remains above its specified limits, the peaking factor surveillances are required each 7 days thereafter to evaluate $F^N_{\Delta H}$ and $F_Q(Z)$ with changes in power distribution.

Relatively small changes are expected due to either burnup and xenon redistribution or correction of the cause for exceeding the QPTR limit.

(continued)

BASES

ACTIONS (continued)

A.4

Although $F^N_{\Delta H}$ and $F_Q(Z)$ are of primary importance as initial conditions in the safety analyses, other changes in the power distribution may occur as the QPTR limit is exceeded and may have an impact on the validity of the safety analysis. A change in the power distribution can affect such reactor parameters as bank worths and peaking factors for rod malfunction accidents. When the QPTR exceeds its limit, it does not necessarily mean a safety concern exists. It does mean that there is an indication of a change in the gross radial power distribution that requires an investigation and evaluation that is accomplished by examining the incore power distribution. Specifically, the core peaking factors and the quadrant tilt must be evaluated because they are the factors which best characterize the core power distribution. This re-evaluation is required to assure that, before increasing THERMAL POWER to above the limit of Required Action A.1, the reactor core conditions are consistent with the assumptions in the safety analyses.

A.5

If the QPTR has exceeded the 1.02 limit and a re-evaluation of the safety analysis is completed and shows that safety requirements are met, the excore detectors are recalibrated to show a zero QPTR prior to increasing THERMAL POWER above the limit of Required Action A.1. This is done to detect any subsequent significant changes in QPTR.

Required Action A.5 is modified by a Note which states that the quadrant power tilt (QPT) is not zeroed out until after the re-evaluation of the safety analysis has determined that core conditions at RTP are within the safety analysis assumptions (Required Action A.4). This Note is intended to prevent any ambiguity about the required sequence of actions.

A.6

Once the flux tilt is zeroed out (Required Action A.5 is performed), it is acceptable to return to full power operation. However, as an added check that the core power distribution at RTP is consistent with the safety analysis assumptions, Required Action A.6 requires

(continued)

BASES

ACTIONS

A.6 (continued)

verification that $F_Q(Z)$ and $F^N_{\Delta H}$ are within their specified limits within 24 hours of reaching RTP. As an added precaution, if the core power does not reach RTP within 24 hours, but is increased slowly, then the peaking factor surveillances must be performed within 48 hours of the time when the ascent to power was begun. These Completion Times are intended to allow adequate time to increase THERMAL POWER to above the limit of Required Action A.1, while not permitting the core to remain with unconfirmed power distributions for extended periods of time.

Required Action A.6 is modified by a Note that states that the peaking factor surveillances may only be done after the excore detectors have been calibrated to show zero tilt (i.e., Required Action A.5). The intent of this Note is to have the peaking factor surveillances performed at operating power levels, which can only be accomplished after the excore detectors are calibrated to show zero tilt and the core returned to power.

B.1

If Required Actions A.1 through A.6 are not completed within their associated Completion Times, the unit must be brought to a MODE or condition in which the requirements do not apply. To achieve the status, THERMAL POWER must be reduced to < 50% RTP within 4 hours. The allowed Completion Time of 6 hours is reasonable based on operating experience regarding the amount of time required to reach the reduced power level without challenging plant systems.

SR 3.2.4.1

SR 3.2.4.1 is modified by a Note that allows QPTR to be calculated with three power range channels if THERMAL POWER is < 75% RTP and one power range channel is inoperable.

This Surveillance verifies that the QPTR as indicated by the Protection and Safety Monitoring System (PMS) excore channels is within its limits. The Frequency of 7 days when the QPTR alarm is OPERABLE is acceptable because of the low probability that this alarm can remain inoperable without detection.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.2.4.1 (continued)

When the QPTR alarm is inoperable, the Frequency is increased to 12 hours. This frequency is adequate to detect any relatively slow changes in QPTR, because, for those causes of QPTR that occur quickly (a dropped rod), there will typically be other indications of abnormality that prompt a verification of core power tilt.

SR 3.2.4.2

This Surveillance is modified by a Note, that states that it is required only when one power range channel is inoperable and the THERMAL POWER is $\geq$ 75% RTP.

With a PMS power range channel inoperable, tilt monitoring for a portion of the reactor core becomes degraded. Large tilts would likely be detected with the remaining channels, but the capability for detection of small power tilts in some quadrants is decreased. Performing SR 3.2.4.2 at a Frequency of 12 hours provides an accurate alternative means for assuring that any tilt remains within its limits.

For purposes of monitoring the QPTR when one power range channel is inoperable, the incore detectors are used to confirm that the normalized symmetric power distribution is acceptable.

With the OPDMS and one PMS channel inoperable, the surveillance of the incore power distribution on a 12 hour basis is sufficient to maintain peaking factors within their normal limits, especially, considering the other LCOs and ACTIONS required when the OPDMS is out of service.

REFERENCES

1. Title 10, Code of Federal Regulations, Part 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors."

2. Regulatory Guide 1.77, Rev. 0, "Assumptions Used for Evaluating a Control Rod Ejection Accident for Pressurized Water Reactors," May 1974.

3. Title 10, Code of Federal Regulations, Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," GDC 26, "Reactivity Control System Redundancy and Capability."

B 3.2 POWER DISTRIBUTION LIMITS

B 3.2.5 OPDMS-Monitored Power Distribution Parameters

BASES

BACKGROUND

The On-line Power Distribution Monitoring System (OPDMS) for the AP600 is an advanced core monitoring and support package. The OPDMS has the ability to continuously monitor core power distribution parameters.

The purpose of the limits on the OPDMS monitored power distribution parameters is to provide assurance of fuel integrity during Conditions I (Normal Operation) and II (incidents of Moderate Frequency) events by: (1) not exceeding the minimum departure from boiling ratio (DNBR) in the core, and (2) limiting the fission gas release, fuel pellet temperature, and cladding mechanical properties to within assumed design criteria. In addition, limiting the peak linear power density during Condition I events provides assurance that the initial conditions assumed for the LOCA analyses are met and the peak cladding temperature (PCT) limit of 2200°F is not exceeded.

The definition of certain quantities used in these specifications are as follows:

Peak kw/ft(Z)	Peak linear power density (axially dependent) as measured in kw/ft.
$F^N_{\Delta H}$	Ratio of the integral of linear power along the rod with the highest integrated power to the average rod power.
Minimum DNBR	Minimum ratio of the critical heat flux to actual heat flux at any point in the reactor that is allowed in order to assure that certain performance and safety criteria requirements are met over the range of plant conditions.

By continuously monitoring the core and following its actual operation, it is possible to significantly limit the adverse nature of power distribution initial conditions for transients which may occur at any time.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

The limits on the above parameters preclude core power distributions from occurring which would violate the following fuel design criteria:

a. During a large break loss of coolant accident (LOCA), the PCT must not exceed a limit of 2200°F (Ref. 1);

b. During a loss of forced reactor coolant flow accident, there must be at least a 95% probability at a 95% confidence level (the 95/95 departure from nucleate boiling (DNB) criterion) that the hot fuel rod in the core does not experience a DNB condition;

c. During an ejected rod accident, the energy deposition to the fuel must not exceed 280 cal/gm (Ref. 2); and

d. The control rods must be capable of shutting down the reactor with a minimum required SDM with the highest worth control rod stuck fully withdrawn.

Limits on linear power density or peak kw/ft assure that the peak linear power density assumed as a base condition in the LOCA analyses is not exceeded during normal operation.

Limits on $F_{\Delta H}$ ensure that the LOCA analysis assumptions and assumptions made with respect to the Overtemperature ΔT Setpoint are maintained.

The limit on DNBR ensures that if transients analyzed in the safety analyses initiate from the conditions within the limit allowed by the OPDMS, the DNB criteria will be met.

The OPDMS monitored power distribution parameters of this LCO satisfy Criterion 2 of the NRC Policy Statement.

LCO

This LCO ensures operation within the bounds assumed in the safety analyses. Calculations are performed in the core design process to confirm that the core can be controlled in such a manner during operation that it can stay within these limits. If the LCO limits cannot be maintained within limits, reduction of the core power is required.

(continued)

BASES

LCO (continued)

Violating the OPDMS monitored power distribution parameter limits could result in unanalyzed conditions should a design basis event occur while the parameters are outside their specified limits.

Peak kw/ft limits define limiting values for core power peaking that precludes peak cladding temperatures above 2200°F during either a large or small break LOCA. The highest calculated linear power densities in the core at specific core elevations are displayed for operator visual verification relative to the COLR values.

The determination of $F^N_{\Delta H}$ identifies the coolant flow channel with the maximum enthalpy rise. This channel has the least heat removal capability and thus the highest probability for DNB. Should $F^N_{\Delta H}$ exceed the limit given in the COLR, the possibility exists for DNBR to exceed the value used as a base condition for the safety analysis.

Two levels of alarms on power distribution parameters are provided to the operator. One serves as a warning before the three parameters (kw/ft(Z), $F^N_{\Delta H}$, DNBR) exceed their values used as a base condition for the safety analysis. The other alarm indicates when the parameters have reached their limits.

APPLICABILITY

The OPDMS monitored power distribution parameter limits must be maintained in MODE 1 above 50% RTD to preclude core power distributions from exceeding the limits assumed in the safety analyses. Applicability in other MODES, and MODE 1 below 50% RTP, is not required because there is either insufficient stored energy in the fuel or insufficient energy transferred to the reactor coolant to require a limit on the distribution of core power.

Specifically for $F^N_{\Delta H}$, the design bases accidents (DBAs) that are sensitive to $F^N_{\Delta H}$ in other MODES (MODES 2 through 5) have significant margin to DNB, and therefore, there is no need to restrict $F^N_{\Delta H}$ in these modes.

In addition to the alarms discussed in the LCO section above (alarms on OPDMS monitored power distribution parameters), there is an alarm indicating the potential inoperability of the OPDMS itself.

(continued)

BASES

APPLICABILITY (continued)

Should the OPDMS be determined to be inoperable for other than reasons of alarms inoperable, this LCO is no longer applicable and LCOs 3.2.1 through 3.2.4 become applicable.

ACTIONS

A.1

With any of the OPDMS monitored power distribution parameters outside of their limits, the assumptions used as most limiting base conditions for the DBA analyses may no longer be valid. The 1 hour operator ACTION requirement to restore the parameter to within limits is consistent with the basis for the anticipated operational occurrences and provides time to assess if there are instrumentation problems. It also allows the possibility to restore the parameter to within limits by rod cluster control assembly (RCCA) motion if this is possible. The OPDMS will continuously monitor these parameters and provide an indication when they are approaching their limits.

B.1

If the OPDMS monitored power distribution parameters cannot be restored to within their limits within the Completion Time of ACTION A.1, it is likely that the problem is not due to a failure of instrumentation. Most of these parameters can be brought within their respective limits by reducing THERMAL POWER because this will reduce the absolute power density at any location in the core thus providing margin to the limit.

If the parameters cannot be returned to within limits as power is being reduced, THERMAL POWER must be reduced to < 50% RTP where the LCOs are no longer applicable.

A note has been added to indicate that if the power distribution parameters in violation are returned to within their limits during the power reduction, then power operation may continue at the power level where this occurs. This is a conservative action for protection against the consequences of severe transients with unanalyzed power distributions.

(continued)

BASES

ACTIONS

B.1 (continued)

The Completion Time of 4 hours provides an acceptable time to reduce power in an orderly manner and without allowing the plant to remain outside the $F^N_{\Delta H}$ limits for an extended period of time.

SURVEILLANCE REQUIREMENTS

With OPDMS operating, the power distribution parameters are continuously computed and displayed, and compared against their limit. Two levels of alarms are provided to the operator. The first alarm provides a warning before these parameters (kw/ft(Z), $F^N_{\Delta H}$, and DNBR) exceed their limits. The second alarm indicates when they actually reach their limits. A third alarm indicates trouble with the OPDMS system.

SR 3.2.5.1

This Surveillance requires the operator to verify that the power distribution parameters are within their limits. This confirmation is a verification in addition to the automated checking performed by the OPDMS system. A 24 hour Surveillance interval provides assurance that the system is functioning properly and that the core limits are met.

With the OPDMS parameter alarms inoperable, an increased Surveillance Frequency is provided to assure that parameters are not approaching the limits. A 12 hour Frequency is adequate to identify changes in these parameters that could lead to their exceeding their limits.

REFERENCES

1. Title 10, Code of Federal Regulations, Part 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors," 1974.

2. Regulatory Guide 1.77, Rev. 0, "Assumptions Used for Evaluating a Control Rod Ejection Accident for Pressurized Water Reactors," May 1974.

B 3.3 INSTRUMENTATION

B 3.3.1 Reactor Trip System (RTS) Instrumentation

BASES

BACKGROUND

The RTS initiates a unit shutdown, based upon the values of selected unit parameters, to protect against violating the core fuel design limits and Reactor Coolant System (RCS) pressure boundary during anticipated operational occurrences (AOOs) and to assist the Engineered Safety Feature Actuation System (ESFAS) in mitigating accidents.

The Protection and Safety Monitoring System (PMS) has been designed to assure safe operation of the reactor. This is achieved by specifying limiting safety system settings (LSSS) in terms of parameters directly monitored by the RTS, as well as specifying LCOs on other reactor system parameters and equipment performance.

During AOOs, which are those events expected to occur one or more times during the unit life, the acceptable limits are:

1. The Departure from Nucleate Boiling Ratio (DNBR) shall be maintained above the Safety Limit (SL) value to prevent departure from nucleate boiling (DNB);
2. Fuel centerline melt shall not occur; and
3. The RCS pressure SL of 2750 psia shall not be exceeded.

Operation within the SLs of Specification 2.0, "Safety Limits (SLs)," also maintains the above values and assures that offsite doses are within the acceptance criteria during AOOs.

Design Basis Accidents (DBA) are events that are analyzed even though they are not expected to occur during the unit life. The acceptable limit during accidents is that the offsite dose shall be maintained within an acceptable fraction of the limits. Different accident categories are allowed a different fraction of these limits, based on the probability of occurrence. Meeting the acceptable dose limit for an accident category is considered having acceptable consequences for that event.

(continued)

BASES

BACKGROUND (continued)

The RTS maintains surveillance on key process variables which are directly related to equipment mechanical limitations, such as pressure, and on variables which directly affect the heat transfer capability of the reactor, such as flow and temperature. Some limits, such as Overtemperature ΔT, are calculated in the integrated protection cabinets from other parameters when direct measurement of the variable is not possible.

The RTS instrumentation is segmented into four distinct but interconnected modules as identified below:

- Field inputs from process sensors, nuclear instrumentation;
- Integrated Protection Cabinets (IPCs);
- Dynamic Trip Bus; and
- Reactor Trip Switchgear Interface.

Field Transmitters and Sensors

Normally, four redundant measurements using four separate sensors are made for each variable used for reactor trip. The use of four channels for protection functions is based on a minimum of two channels being required for a trip or actuation, one channel in test or bypass, and a single failure on the remaining channel. The signal selector in the Plant Control System (PLS) will function with only three channels. This includes two channels properly functioning and one channel having a single failure. For protection channels providing data to the control system, the fourth channel permits one channel to be in test or bypass. Minimum requirements for protection and control is achieved with only three channels OPERABLE. The fourth channel is provided to increase plant availability, and permits the plant to run for an indefinite time with a single channel out of service. The circuit design is able to withstand both an input failure to the control system, which may then require the protection Function actuation, and a single failure in the other channels providing the protection Function actuation. Again, a single failure will neither cause nor prevent the protection Function actuation. These requirements are

(continued)

BASES

BACKGROUND

Field Transmitters and Sensors (continued)

described in IEEE-279 (Ref. 5). The actual number of channels required for each plant parameter is specified in Reference 2.

Selected analog measurements are converted to digital form by digital converters within the integrated protection cabinets. Signal conditioning may be applied to selected inputs following the conversion to digital form. Following necessary calculations and processing, the measurements are compared against the applicable setpoint for that variable. A partial trip signal for the given parameter is generated if one channel measurement exceeds its predetermined or calculation limit. Processing on all variables for reactor trip is duplicated in each of the four redundant divisions of the protection system. Each division sends its partial trip status to each of the other three divisions over isolated multiplexed links. Each division is capable of generating a reactor trip signal if two or more of the redundant channels of a single variable are in the partial trip state.

The reactor trip signal from each of the four integrated protection cabinets is sent to the corresponding reactor trip actuation division. Each of the four reactor trip actuation divisions consists of two reactor trip circuit breakers. The reactor is tripped when two or more actuation divisions receive a reactor trip signal. This automatic trip demand initiates the following two actions:

1. It de-energizes the undervoltage trip attachment on each reactor trip breaker, and

2. It energizes the shunt trip device on each reactor trip breaker.

Either action causes the breakers to trip. Opening of the appropriate trip breakers removes power to the control rod drive mechanism (CRDM) coils, allowing the rods to fall into the core. This rapid negative reactivity insertion shuts down the reactor.

(continued)

BASES

BACKGROUND (continued)

IPCs

The IPCs contain the necessary equipment to:

- Permit acquisition and analysis of the sensor inputs, including plant process sensors and nuclear instrumentation, required for reactor trip and ESF calculations;
- Perform computation or logic operations on variables based on these inputs;
- Provide trip signals to the reactor trip switchgear and ESF actuation data to the ESFACs as required;
- Permit manual trip or bypass of each individual reactor trip Function and permit manual actuation or bypass of each individual voted ESF Function;
- Provide data to other systems in the Instrumentation and Control (I&C) architecture;
- Provide functional diversity for the reactor trips and ESF actuations; and
- Provide separate input circuitry for control Functions that require input from sensors that are also required for protection Functions.

Each of the four IPCs provides signal conditioning, comparable output signals for indications in the main control room, and comparison of measured input signals with established setpoints. The basis of the setpoints are described in References 1, 2, and 3. If the measured value of a unit parameter exceeds the predetermined setpoint, an output is generated which is transmitted to the ESFACs for logic evaluation.

Dynamic Trip Bus

The dynamic trip bus provides a reliable means of opening the reactor trip switchgear in its own division as demanded by the individual protection functions. Signals are transferred between the dynamic trip bus and the reactor trip subsystems, trip enable subsystems, global trip subsystem, and the automatic tester subsystem. These signals include data on

(continued)

BASES

BACKGROUND

Dynamic Trip Bus (continued)

partial trips, partial trip enables, global trip, global bypass permissive, and automatic global bypass. The dynamic trip bus combines this data and determines the desired state of the switchgear.

The dynamic trip bus interface panel incorporates a three position (trip/normal/bypass) switch allowing each trip function to be placed in a manual partial trip, normal or manual bypass state. While the trip/normal/bypass switch remains in the normal position, automatic operation of the partial trip function by the protection function is enabled. When placed in either the trip or bypass position, the dynamic trip logic is forced to the desired partial trip or bypass condition regardless of the reactor trip subsystem output state.

Reactor Trip Switchgear Interface

The final stage of the dynamic trip bus provides the signal to energize the undervoltage trip attachment on each RTB within the reactor trip switchgear. Loss of the signal de-energizes the undervoltage trip attachments and results in the opening of those reactor trip switchgear. An additional external relay is de-energized with loss of the signal. The normally closed contacts of the relay energize the shunt trip attachments on each switchgear at the same time that the undervoltage trip attachment is de-energized. This diverse trip actuation is performed external to the PMS cabinets. The switchgear interface including the trip attachments and the external relay are within the scope of the PMS. Separate outputs are provided for each switchgear. Testing of the interface allows trip actuation of the breakers by either the undervoltage trip attachment or the shunt trip attachment.

Trip Setpoints and Allowable Values

The Trip Setpoints are the nominal values at which the trip output is set. Any trip output is considered to be properly adjusted when the "as left" value is within the band for CHANNEL CALIBRATION accuracy (i.e., ± rack calibration accuracy).

(continued)

BASES

BACKGROUND

Trip Setpoints and Allowable Values (continued)

The Trip Setpoints used in the trip output are based on the analytical limits stated in Reference 1. The selection of these Trip Setpoints is such that adequate protection is provided when all sensor and processing time delays are taken into account. To allow for calibration tolerances, instrument drift, and severe environment errors for those RTS channels that must function in harsh environments as defined by 10 CFR 50.49 (Ref. 6), the Trip Setpoints and Allowable Values specified in Table 3.3.1-1 in the accompanying LCO are conservatively adjusted with respect to the analytical limits. A detailed description of the methodology used to calculate the Trip Setpoints, including their explicit uncertainties, is provided in the "Westinghouse Setpoint Methodology for Protection Systems" (Refs. 4 and 9). The actual nominal Trip Setpoint entered into the trip output is more conservative than that specified by the Allowable Value to account for changes in random measurement errors detectable by a COT. One example of such a change in measurement error is drift during the surveillance interval. If the measured setpoint does not exceed the Allowable Value, the trip output is considered OPERABLE.

Setpoints in accordance with the Allowable Value ensure that SLs are not violated during AOOs (and that the consequences of DBAs will be acceptable, providing the unit is operated from within the LCOs at the onset of the AOO or DBA and the equipment functions as designed). Note that in the accompanying LCO 3.3.1, the Trip Setpoints of Table 3.3.1-1 are the LSSS.

Each channel of the process control equipment can be tested on line to verify that the signal or setpoint accuracy is within the specified allowance requirements of Reference 4. Once a designated channel is taken out of service for testing, a simulated signal is injected in place of the field instrument signal. The process equipment for the channel in test is then tested, verified, and calibrated. SRs for the channels are specified in the SRs section.

The Trip Setpoints and Allowable Values listed in Table 3.3.1-1 are based on the methodology described in Reference 4, which incorporates all of the known uncertainties applicable for each channel. The magnitudes of these uncertainties are factored into the determination of

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BASES

BACKGROUND

Trip Setpoints and Allowable Values (continued)

each Trip Setpoint. All field sensors and signal processing equipment for these channels are assumed to operate within the allowances of these uncertainty magnitudes. Transmitter calibration tolerances and drift allowances must be specified in plant calibration procedures, and must be consistent with the values used in the setpoint methodology.

The OPERABILITY of each transmitter or sensor can be evaluated when its "as found" calibration data are compared against the "as left" data and are shown to be within the setpoint methodology assumptions. The basis of the setpoints is described in References 1, 2, 3, and 4. Trending of transmitter calibration is required by Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle."

Each channel of the IPC can be tested on line to verify that the signal or setpoint accuracy is within the specified allowance requirements. This test may be performed by using the built-in automatic tester. Once a designated channel is taken out of service for testing, a simulated signal is automatically injected in place of the field instrument signal. The process equipment for the channel in test is then tested, verified, and calibrated. The IPC channel is considered to be OPERABLE if the channel passes the automatic testing. Surveillance Requirements for the channels are specified in the Surveillance Requirements section.

Reactor Trip (RT) Channel

An RT Channel extends from the sensor to the output of the associated reactor trip subsystem (RT1 or RT2) in the integrated protection cabinets, and includes the sensor (or sensors), the signal conditioning, any associated datalinks, and the associated reactor trip subsystem. For RT Channels containing nuclear instrumentation, the RT Channel also includes the nuclear instrument signal conditioning and the associated Nuclear Instrumentation Signal Processing and Control (NISPAC) subsystem in the integrated protection cabinets.

(continued)

BASES

BACKGROUND (continued)

Automatic Trip Logic

The Automatic Trip Logic extends from, but does not include, the outputs of the various RT Channels to, but does not include, the reactor trip breakers. The Automatic Trip Logic includes the Trip Enable Subsystem, the Global Trip Subsystem, any associated datalinks, and the Dynamic Trip Bus. Operator bypass of a reactor trip function is performed within the Automatic Trip Logic.

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

The RTS functions to maintain the SLs during all AOOs and mitigates the consequences of DBAs in all MODES in which the RTBs are closed.

Each of the analyzed accidents and transients which require reactor trip can be detected by one of more RTS functions. The accident analysis described in Reference 3 takes credit for most RTS trip Functions. RTS trip Functions not specifically credited in the accident analysis were qualitatively credited in the safety analysis and the NRC staff approved licensing basis for the plant. These RTS trip Functions may provide protection for conditions which do not require dynamic transient analysis to demonstrate function performance. These RTS trip Functions may also serve as backups to RTS trip Functions that were credited in the accident analysis.

The LCO requires all instrumentation performing an RTS Function, listed in Table 3.3.1-1 in the accompanying LCO, to be OPERABLE. Failure of any instrument renders the affected channel(s) inoperable and reduces the reliability of the affected Functions.

The LCO generally requires OPERABILITY of three channels in each instrumentation Function.

Reactor Trip System Functions

The safety analyses and OPERABILITY requirements applicable to each RTS Function are discussed below:

1. Manual Reactor Trip

The Manual Reactor Trip ensures that the main control room operator can initiate a reactor trip at any time by

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

1. Manual Reactor Trip (continued)

using either of two reactor trip actuation devices in the main control room. A Manual Reactor Trip accomplishes the same results as any one of the automatic trip Functions. It can be used by the reactor operator to shutdown the reactor whenever any parameter is rapidly trending toward its Trip Setpoint. The safety analyses do not take credit for the Manual Reactor Trip.

The LCO requires two Manual Reactor Trip actuation devices be OPERABLE in MODES 1 and 2 and in MODES 3, 4, and 5 with RTBs closed and PLS capable of rod withdrawal. Two independent actuation devices are required to be OPERABLE so that no single random failure will disable the Manual Reactor Trip Function.

In MODE 1 or 2, manual initiation of a reactor trip must be OPERABLE. These are the MODES in which the shutdown rods and/or control rods are partially or fully withdrawn from the core. In MODE 3, 4, or 5, the manual initiation Function must also be OPERABLE if the shutdown or control rods are withdrawn or the PLS is capable of withdrawing the shutdown or control rods. In MODES 3, 4, and 5, manual initiation of a reactor trip does not have to be OPERABLE if the PLS is not capable of withdrawing the shutdown or control rods. If the rods cannot be withdrawn from the core, there is no need to be able to trip the reactor because all of the rods are inserted. In MODE 6, neither the shutdown rods nor the control rods are permitted to be withdrawn and the CRDMs are disconnected from the control rods and shutdown rods. Therefore, the manual initiation Function does not have to be OPERABLE.

2. Power Range Neutron Flux

The PMS power range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The PMS power range detectors provide input to the PLS. Minimum requirements for protection and control is achieved with three channels OPERABLE. The fourth channel is provided to increase plant availability, and permits the plant to run for an indefinite time with a single channel in trip or bypass. This Function also satisfies the requirements of IEEE 279 (Ref. 5) with 2/4 logic. This Function also provides a signal to

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

2. Power Range Neutron Flux (continued)

prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

a. Power Range Neutron Flux - High

The Power Range Neutron Flux - High trip Function ensures that protection is provided, from all power levels, against a positive reactivity excursion during power operations. Positive reactivity excursions can be caused by rod withdrawal or reductions in RCS temperature.

The LCO requires four Power Range Neutron Flux - High channels to be OPERABLE in MODES 1 and 2.

In MODE 1 or 2, when a positive reactivity excursion could occur, the Power Range Neutron Flux - High trip must be OPERABLE. This Function will terminate the reactivity excursion and shutdown the reactor prior to reaching a power level that could damage the fuel. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux - High trip does not have to be OPERABLE because the reactor is shutdown and a reactivity excursion in the power range cannot occur. Other RTS Functions and administrative controls provide protection against reactivity additions when in MODE 3, 4, 5, or 6. In addition, the PMS power range detectors cannot detect neutron levels in this range.

b. Power Range Neutron Flux - Low

The LCO requirement for the Power Range Neutron Flux - Low trip Function ensures that protection is provided against a positive reactivity excursion from low power or subcritical conditions. The Trip Setpoint reflects only steady state instrument uncertainties as this Function does not provide primary protection for any event that results in a harsh environment.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

b. Power Range Neutron Flux – Low (continued)

The LCO requires four of the Power Range Neutron Flux – Low channels to be OPERABLE in MODE 1 below the Power Range Neutron Flux P-10 Setpoint and MODE 2.

In MODE 1, below the Power Range Neutron Flux P-10 setpoint and in MODE 2, the Power Range Neutron Flux – Low trip must be OPERABLE. This Function may be manually blocked by the operator when the respective power range channel is greater than approximately 10% of RTP (P-10 setpoint). This Function is automatically unblocked when the respective power range channel is below the P-10 setpoint. Above the P-10 setpoint, positive reactivity additions are mitigated by the Power Range Neutron Flux – High trip Function.

In MODE 3, 4, 5, or 6, the Power Range Neutron Flux–Low trip Function does not have to be OPERABLE because the reactor is shutdown and the PMS power range detectors cannot detect neutron levels generated in MODES 3, 4, 5, and 6. Other RTS trip Functions and administrative controls provide protection against positive reactivity additions or power excursions in MODE 3, 4, 5, or 6.

3. Power Range Neutron Flux – High Positive Rate

The Power Range Neutron Flux – High Positive Rate trip Function ensures that protection is provided against rapid increases in neutron flux which are characteristic of a rod cluster control assembly (RCCA) drive rod housing rupture and the accompanying ejection of the RCCA. This Function compliments the Power Range Neutron Flux – High and Low trip Functions to ensure that the criteria are met for a rod ejection from the power range. The Power Range Neutron Flux Rate trip uses the same channels as discussed for Function 2 above.

The LCO requires four Power Range Neutron Flux – High Positive Rate channels to be OPERABLE. In MODE 1 or 2, when there is a potential to add a large amount of positive reactivity from a rod ejection accident (REA), the Power Range Neutron Flux – High Positive Rate trip

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

3. Power Range Neutron Flux – High Positive Rate (continued)

must be OPERABLE. In MODE 3, 4, 5, or 6, the Power Range Neutron Flux – High Positive Rate trip Function does not have to be OPERABLE because other RTS trip Functions and administrative controls will provide protection against positive reactivity additions. Also, since only the shutdown banks may be withdrawn in MODE 3, 4, or 5, the remaining complement of control bank worth ensures a SDM in the event of an REA. In MODE 6, no rods are withdrawn and the SDM is increased during refueling operations. The reactor vessel head is also removed or the closure bolts are detensioned preventing any pressure buildup. In addition, the PMS power range detectors cannot detect neutron levels present in this MODE.

4. Intermediate Range Neutron Flux

The Intermediate Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled RCCA bank withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux – Low Setpoint trip Function. The PMS intermediate range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The safety analyses do not take credit for the Intermediate Range Neutron Flux trip Function. Even though the safety analyses take no credit for the Intermediate Range Neutron Flux trip, the functional capability at the specified Trip Setpoint enhances the overall diversity of the RTS. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any events that result in a harsh environment. This trip can be manually blocked by the main control room operator when above the P-10 setpoint, which is the respective PMS power range channel greater than 10% power, and is automatically unblocked when below the P-10 setpoint, which is the respective PMS power range channel less than 10% power. This Function also provides a signal to prevent automatic and manual rod withdrawal prior to initiating a reactor trip. Limiting further rod withdrawal may terminate the transient and eliminate the need to trip the reactor.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

4. Intermediate Range Neutron Flux (continued)

The LCO requires four channels of Intermediate Range Neutron Flux to be OPERABLE. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 below the P-10 setpoint, and in MODE 2, when there is a potential for an uncontrolled rod withdrawal accident during reactor startup, the Intermediate Range Neutron Flux trip must be OPERABLE. Above the P-10 setpoint, the Power Range Neutron Flux – High Setpoint trip and the Power Range Neutron Flux – High Positive Rate trip provide core protection for a rod withdrawal accident. In MODE 3, 4, or 5, the Intermediate Range Neutron Flux trip does not have to be OPERABLE because the control rods must be fully inserted and only the shutdown rods may be withdrawn. The reactor cannot be started up in this condition. The core also has the required SDM to mitigate the consequences of a positive reactivity addition accident. In MODE 6, all rods are fully inserted and the core has a required increased SDM. Also, the PMS intermediate range detectors cannot detect neutron levels present in this mode.

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip Function ensures that protection is provided against an uncontrolled bank rod withdrawal accident from a subcritical condition during startup. This trip Function provides redundant protection to the Power Range Neutron Flux – Low Setpoint and Intermediate Range Neutron Flux trip Functions. In MODES 3, 4, and 5, administrative controls also prevent the uncontrolled withdrawal of rods. The PMS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The safety analyses do not take credit for the Source Range Neutron Flux trip Function. Even though the safety analyses take no credit for the Source Range Neutron Flux trip, the functional capability at the specified Trip Setpoint is assumed to be available and the trip is implicitly assumed in the safety analyses.

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

5. Source Range Neutron Flux (continued)

The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any events that result in a harsh environment. This trip can be manually blocked by the main control room operator when above the P-6 setpoint (Intermediate Range Neutron Flux interlock) and is automatically unblocked when below the P-6 setpoint. The manual block of the trip function also de-energizes the source range detectors. The source range detectors are automatically re-energized when below the P-6 setpoint. The trip is automatically blocked when above the P-10 setpoint (Power Range Neutron Flux interlock). The source range trip is the only RTS automatic protective Function required in MODES 3, 4, and 5. Therefore, the functional capability at the specified Trip Setpoint is assumed to be available.

The LCO requires four channels of Source Range Neutron Flux to be OPERABLE in MODE 2 below P-6 and in MODE 3, 4, or 5 with RTBs closed and Control Rod Drive System capable of rod withdrawal. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function. In MODE 3, 4, or 5 with the RTBs open, the LCO does not require the Source Range Neutron Flux channels for reactor trip Functions to be OPERABLE.

In MODE 2 when below the P-6 setpoint during a reactor startup, the Source Range Neutron Flux trip must be OPERABLE. Above the P-6 setpoint, the Intermediate Range Neutron Flux trip and the Power Range Neutron Flux – Low Setpoint trip will provide core protection for reactivity accidents. Above the P-6 setpoint, the PMS source range detectors are de-energized and inoperable as described above.

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

5. Source Range Neutron Flux (continued)

In MODE 3, 4, or 5 with the reactor shutdown, the Source Range Neutron Flux trip Function must also be OPERABLE. If the PLS is capable of rod withdrawal, the Source Range Neutron Flux trip must be OPERABLE to provide core protection against a rod withdrawal accident. If the PLS is not capable of rod withdrawal, the source range detectors are required to be OPERABLE to provide monitoring of neutron levels and provide protection for events like an inadvertent boron dilution. These Functions are addressed in LCO 3.3.2, "Engineered Safety Feature Actuation System (ESFAS) Instrumentation." The requirements for the PMS source range detectors in MODE 6 are addressed in LCO 3.9.3, "Nuclear Instrumentation."

6. Overtemperature ΔT

The Overtemperature ΔT trip Function ensures that protection is provided to ensure that the design limit DNBR is met. This trip Function also limits the range over which the Overpower ΔT trip Function must provide protection. The inputs to the Overtemperature ΔT trip include all combinations of pressure, power, coolant temperature, and axial power distribution, assuming full reactor coolant flow. Protection from violating the DNBR limit is assured for those transients that are slow with respect to delays from the core to the measurement system. The Overtemperature ΔT trip Function uses each loop ΔT as a measure of reactor power and is automatically varied with the following parameters:

- reactor coolant average temperature - the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature;

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

6. Overtemperature ΔT (continued)

- pressurizer pressure - the Trip Setpoint is varied to correct for changes in system pressure; and

- axial power distribution - the Trip Setpoint is varied to account for imbalances in the axial power distribution as detected by the PMS upper and lower power range detectors. If axial peaks are greater than the design limit, as indicated by the difference between the upper and lower PMS power range detectors, the Trip Setpoint is reduced in accordance with Note 1 of Table 3.3.1-1.

Dynamic compensation is included for system piping delays from the core to the temperature measurement system. The Overtemperature ΔT trip Function is calculated for each loop as described in Note 1 of Table 3.3.1-1. This Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback will reduce turbine power and reactor power. A reduction in power will normally alleviate the Overtemperature ΔT condition and may prevent a reactor trip. No credit is taken in the safety analyses for the turbine runback.

The LCO requires four channels of the Overtemperature ΔT trip Function to be OPERABLE in MODES 1 and 2. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function. Note that the Overtemperature ΔT Function receives input from channels shared with other RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to all affected Functions.

In MODE 1 or 2, the Overtemperature ΔT trip must be OPERABLE to prevent DNB. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about DNB.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

7. Overpower ΔT

The Overpower ΔT trip Function ensures that protection is provided to ensure the integrity of the fuel (i.e., no fuel pellet melting and less than 1% cladding strain) under all possible overpower conditions. This trip Function also limits the required range of the Overtemperature ΔT trip function and provides a backup to the Power Range Neutron Flux – High Setpoint trip. The Overpower ΔT trip Function ensures that the allowable heat generation rate (kW/ft) of the fuel is not exceeded. It uses the ΔT of each loop as a measure of reactor power and is automatically varied with the following parameters:

- reactor coolant average temperature - the Trip Setpoint is varied to correct for changes in coolant density and specific heat capacity with changes in coolant temperature; and
- rate of change of reactor coolant average temperature - including dynamic compensation for the delays between the core and the temperature measurement system.

The Overpower ΔT trip Function is calculated for each loop as per Note 2 of Table 3.3.1-1. The Trip Setpoint reflects the inclusion of both steady state and adverse environmental instrument uncertainties as the detectors provide protection for a steam line break and may be in a harsh environment. Note that this Function also provides a signal to generate a turbine runback prior to reaching the Trip Setpoint. A turbine runback reduces turbine power and reactor power. A reduction in power normally alleviates the Overpower ΔT condition and may prevent a reactor trip.

The LCO requires four channels of the Overpower ΔT trip Function to be OPERABLE in MODES 1 and 2. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function. The Overpower ΔT Function receives input from channels shared with other

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

7. Overpower ΔT (continued)

RTS Functions. Failures that affect multiple Functions require entry into the Conditions applicable to a affected Functions.

In MODE 1 or 2, the Overpower ΔT trip Function must be OPERABLE. These are the only times that enough heat is generated in the fuel to be concerned about the heat generation rates and overheating of the fuel. In MODE 3, 4, 5, or 6, this trip Function does not have to be OPERABLE because the reactor is not operating and there is insufficient heat production to be concerned about fuel overheating and fuel damage.

8. Pressurizer Pressure

The same sensors provide input to the Pressurizer Pressure – High and – Low trips and the Overtemperature ΔT trip.

a. Pressurizer Pressure – Low

The Pressurizer Pressure – Low trip Function ensures that protection is provided against violating the DNBR limit due to low pressure. The Trip Setpoint reflects both steady state and adverse environmental instrument uncertainties as the detectors provide primary protection for an event that results in a harsh environment.

The LCO requires four channels of Pressurizer Pressure – Low to be OPERABLE in MODE 1 above P-10. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1, when DNB is a major concern, the Pressurizer Pressure – Low trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-10 interlock. On decreasing power, this trip Function is automatically blocked below P-10. Below the P-10 setpoint, no conceivable power distributions can occur that would cause DNB concerns.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

b. Pressurizer Pressure - High

The Pressurizer Pressure - High trip Function ensures that protection is provided against overpressurizing the RCS. This trip Function operates in conjunction with the safety valves to prevent RCS overpressure conditions. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

The LCO requires four channels of the Pressurizer Pressure - High to be OPERABLE in MODES 1 and 2. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 or 2, the Pressurizer Pressure - High trip must be OPERABLE to help prevent RCS overpressurization and LCOs, and minimizes challenges to the safety valves. In MODE 3, 4, 5, or 6, the Pressurizer Pressure - High trip Function does not have to be OPERABLE because transients which could cause an overpressure condition will be slow to occur. Therefore, the operator will have sufficient time to evaluate plant conditions and take corrective actions. Additionally, low temperature overpressure protection systems provide overpressure protection when below MODE 4.

9. Pressurizer Water Level - High 3

The Pressurizer Water Level - High 3 trip Function provides a backup signal for the Pressurizer Pressure - High 3 trip and also provides protection against water relief through the pressurizer safety valves. These valves are designed to pass steam in order to achieve their design energy removal rate. A reactor trip is actuated prior to the pressurizer becoming water solid. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment. The level channels do not actuate the safety valves.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

9. Pressurizer Water Level – High 3 (continued)

The LCO requires four channels of Pressurizer Water Level – High 3 to be OPERABLE in MODE 1 above P-10. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 when there is a potential for overfilling the pressurizer, the Pressurizer Water Level – High 3 trip must be OPERABLE. This trip Function is automatically enabled on increasing power by the P-10 interlock. On decreasing power, this trip Function is automatically blocked below P-10. Below the P-10 setpoint, transients which could raise the pressurizer water level will be slow and the operator will have sufficient time to evaluate plant conditions and take corrective actions.

10. Reactor Coolant Flow – Low

a. Reactor Coolant Flow – Low (Single Cold Leg)

The Reactor Coolant Flow – Low (Single Cold Leg) trip Function ensures that protection is provided against violating the DNBR limit due to low flow in one or more RCS cold legs. Above the P-8 setpoint, a loss of flow in any RCS cold leg will actuate a reactor trip. Each RCS cold leg has four flow detectors to monitor flow. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

The LCO requires four Reactor Coolant Flow – Low channels per cold leg to be OPERABLE in MODE 1 above P-8. Four OPERABLE channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 above the P-8 setpoint, when a loss of flow in one RCS cold leg could result in DNB conditions in the core, the Reactor Coolant Flow – Low (Single Cold Leg) trip must be OPERABLE. In MODE 1 below the P-8 setpoint, a loss of flow in

(continued)

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

a. Reactor Coolant Flow – Low (Single Cold Leg) (continued)

two or more cold legs is required to actuate a reactor trip (Function 10.b) because of the lower power level and the greater margin to the design limit DNBR.

b. Reactor Coolant Flow – Low (Two Cold Legs)

The Reactor Coolant Flow – Low (Two Cold Legs) trip Function ensures that protection is provided against violating the DNBR limit due to low flow in two or more RCS cold legs. Above the P-10 setpoint and below the P-8 setpoint, a loss of flow in two or more cold legs will initiate a reactor trip. Each cold leg has four flow detectors to monitor flow. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

The LCO requires four Reactor Coolant Flow – Low channels per cold leg to be OPERABLE in MODE 1 above P-10 and below P-8. Four OPERABLE channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 above the P-10 setpoint and below the P-8 setpoint, the Reactor Coolant Flow – Low (Two Cold Legs) trip must be OPERABLE. Below the P-10 setpoint, all reactor trips on low flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-10 setpoint, the reactor trip on low flow in two or more RCS cold legs is automatically enabled. Above the P-8 setpoint, a loss of flow in any one cold leg will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

11. Reactor Coolant Pump (RCP) Bearing Water Temperature – High

a. RCP Bearing Water Temperature – High (Single Pump)

The RCP Bearing Water Temperature – High (Single Pump) reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in one RCS cold leg. Above the P-8 setpoint, high bearing water temperature in any RCP will initiate a reactor trip. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

The LCO requires four RCP Bearing Water Temperature – High channels per RCP to be OPERABLE in MODE 1 above P-8. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 above the P-8 setpoint, when a loss of flow in any RCS cold leg could result in DNB conditions in the core, the RCP Bearing Water Temperature – High (Single Pump) trip must be OPERABLE. In MODE 1 below the P-8 setpoint, a loss of flow in two or more cold legs is required to actuate a reactor trip because of the lower power level and the greater margin to the design limit DNBR.

b. RCP Bearing Water Temperature – High (Two Pumps)

The RCP Bearing Water Temperature – High (Two Pumps) reactor trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS cold legs. Above the P-10 setpoint and below the P-8 setpoint, a high bearing water temperature in two or more RCPs will initiate a reactor trip. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

b. RCP Bearing Water Temperature – High (Two Pumps) (continued)

The LCO requires four RCP Bearing Water Temperature – High channels per RCP to be OPERABLE in MODE 1 above P-10 and below P-8. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 above the P-10 setpoint and below the P-8 setpoint, the RCP Bearing Water Temperature – High (Two Pumps) trip must be OPERABLE. Below the P-10 setpoint, all reactor trips on loss of flow are automatically blocked since no conceivable power distributions could occur that would cause a DNB concern at this low power level. Above the P-10 setpoint, the reactor trip on loss of flow in two RCS cold legs is automatically enabled. Above the P-8 setpoint, a loss of flow in any one cold leg will actuate a reactor trip because of the higher power level and the reduced margin to the design limit DNBR.

12. Reactor Coolant Pump Speed – Low

The RCP Speed – Low trip Function ensures that protection is provided against violating the DNBR limit due to a loss of flow in two or more RCS cold legs. The speed of each RCP is monitored. Above the P-10 setpoint a low speed detected on two or more RCPs will initiate a reactor trip. The Trip Setpoint reflects only steady state instrument uncertainties as the detectors do not provide primary protection for any event that results in a harsh environment.

The LCO requires four RCP Speed – Low channels to be OPERABLE in MODE 1 above P-10. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 above the P-10 setpoint, the RCP Speed – Low trip must be OPERABLE. Below the P-10 setpoint, all reactor trips on loss of flow are automatically blocked since no power distributions are expected to occur that

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

12. Reactor Coolant Pump Speed - Low (continued)

would cause a DNB concern at this low power level. Above the P-10 setpoint, the reactor trip on loss of flow in two or more RCS cold legs is automatically enabled.

13. Steam Generator Water Level - Low

The SG Water Level - Low trip Function ensures that protection is provided against a loss of heat sink. The SGs are the heat sink for the reactor. In order to act as a heat sink, the SGs must contain a minimum amount of water. A narrow range low level in any steam generator is indicative of a loss of heat sink for the reactor. The Trip Setpoint reflects the inclusion of both steady state and adverse environmental instrument uncertainties as the detectors provide primary protection for an event that results in a harsh environment. This Function also contributes to the coincidence logic for the ESFAS Function of opening the Passive Residual Heat Removal (PRHR) discharge valves.

The LCO requires four channels of SG Water Level - Low per SG to be OPERABLE in MODES 1 and 2. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODE 1 or 2, when the reactor requires a heat sink, the SG Water Level - Low trip must be OPERABLE. The normal source of water for the SGs is the Main Feedwater System (non-safety related). The Main Feedwater System is normally in operation in MODES 1 and 2. PRHR is the safety related backup heat sink for the reactor. During normal startups and shutdowns, the Main and Startup Feedwater Systems (non-safety related) can provide feedwater to maintain SG level. In MODE 3, 4, 5, or 6, the SG Water Level - Low Function does not have to be OPERABLE because the reactor is not operating or even critical.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

14. Steam Generator Water Level - High 2

The SG Water Level - High 2 trip Function ensures that protection is provided against excessive feedwater flow by closing the main feedwater control valves, tripping the turbine, and tripping the reactor. While the transmitters (d/p cells) are located inside containment, the events which this function protects against cannot cause severe environment in containment. Therefore, the Trip Setpoint reflects only steady state instrument uncertainties.

The LCO requires four channels of SG Water Level - High 2 per SG to be OPERABLE in MODES 1 and 2. Four channels are provided to permit one channel in trip or bypass indefinitely and still ensure no single random failure will disable this trip Function.

In MODES 1 and 2 above the P-11 interlock, the SG Water Level - High 2 trip must be OPERABLE. The normal source of water for the SGs is the Main Feedwater System (non-safety related). The Main Feedwater System is only in operation in MODES 1 and 2. In MODE 3, 4, 5, or 6, the SG Water Level - High 2 Function does not have to be OPERABLE because the reactor is not operating or even critical. The P-11 interlock is provided on this Function to permit bypass of the trip Function when the pressure is below P-11. This bypass is necessary to permit rod testing when the steam generators are in wet layup.

15. Safeguards Actuation Signal from Engineered Safety Feature Actuation System

The Safeguards Actuation Signal from ESFAS ensures that if a reactor trip has not already been generated by the RTS, the ESFAS automatic actuation logic will initiate a reactor trip upon any signal which initiates the Safeguards Actuation signal. This is a condition of acceptability for the Loss of Coolant Accident (LOCA). However, other transients and accidents take credit for varying levels of ESFAS performance and rely upon rod insertion, except for the most reactive rod which is assumed to be fully withdrawn, to ensure reactor shutdown.

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15. Safeguards Actuation Signal from Engineered Safety Feature Actuation System (continued)

The LCO requires two manual and four automatic divisions of Safeguards Actuation Signal Input from ESFAS to be OPERABLE in MODES 1 and 2. Four automatic divisions are provided to permit one division bypass indefinitely and still ensure no single random failure will disable this trip Function.

A reactor trip is initiated every time a Safeguards Actuation signal is present. Therefore, this trip Function must be OPERABLE in MODES 1 and 2, when the reactor is critical, and must be shutdown in the event of an accident. In MODE 3, 4, 5, or 6, the reactor is not critical.

16. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current plant status. They back up operator actions to ensure protection system Functions are not blocked during plant conditions under which the safety analysis assumes the Functions are OPERABLE. Therefore, the interlock Functions do not need to be OPERABLE when the associated reactor trip Functions are outside the applicable MODES. These are:

a. Intermediate Range Neutron Flux, P-6

The Intermediate Range Neutron Flux, P-6 interlock is actuated when the respective PMS Intermediate Range Neutron Flux channel goes approximately one decade above the minimum channel reading. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

(1) on increasing power, the P-6 interlock allows the manual block of the respective PMS Source Range, Neutron Flux reactor trip. This prevents a premature block of the source range trip and allows the operator to ensure that the intermediate range is OPERABLE prior to leaving the source range. When the source range trip is blocked, the high voltage to the detectors is also removed.

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APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

a. Intermediate Range Neutron Flux, P-6 (continued)

(2) on decreasing power, the P-6 interlock automatically energizes the PMS source range detectors and enables the PMS Source Range Neutron Flux reactor trip.

(3) on increasing power, the P-6 interlock provides a backup block signal to the source range neutron flux doubling circuit. Normally, this Function is manually blocked by the main control room operator during the reactor startup.

The LCO requires four channels of Intermediate Range Neutron Flux, P-6 interlock to be OPERABLE in MODE 2 when below the P-6 interlock setpoint.

In MODE 2, when below the P-6 interlock setpoint, the P-6 interlock must be operable. Above the P-6 interlock setpoint, the PMS Source Range Neutron Flux reactor trip will be blocked; and this Function will no longer be necessary. In MODES 3, 4, 5, and 6, the P-6 interlock does not have to be OPERABLE because the PMS Source Range is providing core protection.

b. Power Range Neutron Flux, P-8

The Power Range Neutron Flux, P-8 interlock is actuated at approximately 48% power as determined by the respective PMS power range detector. The P-8 interlock automatically enables the Reactor Coolant Flow – Low (Single Cold Leg) and RCP Bearing Water Temperature – High (Single Pump) reactor trips on increasing power. The LCO requirement for this trip Function ensures that protection is provided against a loss of flow in any RCS cold leg that could result in DNB conditions in the core when greater than approximately 48% power. On decreasing power, the reactor trip on low flow in any cold leg is automatically blocked.

The LCO requires four channels of Power Range Neutron Flux, P-8 interlock to be OPERABLE in MODE 1.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

b. Power Range Neutron Flux, P-8 (continued)

In MODE 1, a loss of flow in one RCS cold leg could result in DNB conditions, so the Power Range Neutron Flux, P-8 interlock must be OPERABLE. In MODE 2, 3, 4, 5, or 6, this Function does not have to be OPERABLE because the core is not producing sufficient power to be concerned about DNB conditions.

c. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock is actuated at approximately 10% power as determined by the respective PMS power-range detector. The LCO requirement for the P-10 interlock ensures that the following functions are performed:

(1) on increasing power, the P-10 interlock automatically enables reactor trips on the following Functions:

- Pressurizer Pressure – Low,
- Pressurizer Water Level – High 3,
- Reactor Coolant Flow – Low (Two Cold Legs),
- RCP Bearing Water Temperature – High (Two Pumps), and
- RCP Speed – Low.

These reactor trips are only required when operating above the P-10 setpoint (approximately 10% power). These reactor trips provide protection against violating the DNBR limit. Below the P-10 setpoint, the RCS is capable of providing sufficient natural circulation without any RCP running.

(2) on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

c. Power Range Neutron Flux, P-10 (continued)

(3) on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux – Low Setpoint reactor trip.

(4) on increasing power, the P-10 interlock automatically provides a backup block signal to the Source Range Neutron Flux reactor trip and also to de-energize the PMS source range detectors.

(5) on decreasing power, the P-10 interlock automatically blocks reactor trips on the following Functions:

- Pressurizer Pressure – Low,
- Pressurizer Water Level – High 3,
- Reactor Coolant Flow – Low (Two Cold Legs),
- RCP Bearing Water Temperature – High (Two Pumps), and
- RCP Speed – Low.

(6) on decreasing power, the P-10 interlock automatically enables the Power Range Neutron Flux – Low reactor trip and the Intermediate Range Neutron Flux reactor trip (and rod stop).

The LCO requires four channels of Power Range Neutron Flux, P-10 interlock to be OPERABLE in MODE 1 or 2.

In MODE 1, when the reactor is at power, the Power Range Neutron Flux, P-10 interlock must be OPERABLE. This Function must be OPERABLE in MODE 2 to ensure that core protection is provided during a startup or shutdown by the Power Range Neutron Flux – Low Setpoint and Intermediate Range Neutron Flux reactor trips. In MODE 3, 4, 5, or 6, this Function does not have to be OPERABLE because the reactor is not at power and the Source Range Neutron Flux reactor trip provides core protection.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

d. Pressurizer Pressure, P-11

With pressurizer pressure channels less than the P-11 setpoint, the operator can manually block the Steam Generator Narrow Range Water Level – High 2 reactor Trip. This allows rod testing with the steam generators in cold wet layup. With pressurizer pressure channels > P-11 setpoint, the Steam Generator Narrow Range Water Level – High 2 reactor Trip is automatically enabled. The operator can also enable these actuations by use of the respective manual reset.

17. Reactor Trip Breakers

This trip Function applies to the RTBs exclusive of individual trip mechanisms. There are eight reactor trip breakers with two breakers in each division. The reactor trip circuit breakers are arranged in a two-out-of-four logic configuration, such that the tripping of the two circuit breakers associated with one division does not cause a reactor trip. This circuit breaker arrangement is illustrated in Figure 7.1-7. The LCO requires three divisions of the Reactor Trip Switchgear to be OPERABLE with two trip breakers associated with each required division. This logic is required to meet the safety function assuming a single failure.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs are closed, and the PLS is capable of rod withdrawal.

18. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms

The LCO requires both the Undervoltage and Shunt Trip Mechanisms to be OPERABLE for each RTB that is in service. The trip mechanisms are not required to be OPERABLE for trip breakers that are open, racked out, incapable of supplying power to the PLS, or declared inoperable under Function 17 above. OPERABILITY of both trip mechanisms on each breaker ensures that no single trip mechanism failure will prevent opening the breakers on a valid signal.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY

18. Reactor Trip Breaker Undervoltage and Shunt Trip Mechanisms (continued)

These trip Functions must be OPERABLE in MODES 1 and 2 when the reactor is critical. In MODES 3, 4, and 5, these RTS trip Functions must be OPERABLE when the RTBs are closed, and the PLS is capable of rod withdrawal.

19. Automatic Trip Logic

The LCO requirement for the RTBs (Functions 17 and 18) and Automatic Trip Logic (Function 19) ensures that means are provided to interrupt the power to the CRDMs and allow the rods to fall into the reactor core. Each RTB is equipped with an undervoltage coil and a shunt trip coil to trip the breaker open when needed.

The LCO requires four divisions of RTS Automatic Trip Logic to be OPERABLE. Four OPERABLE divisions are provided to ensure that a random failure of a single logic channel will not prevent reactor trip.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs are closed and the PLS is capable of rod withdrawal.

20. ADS Stages 1, 2 and 3 Actuation

The LCO requirement for this Function provides a reactor trip for any event that may initiate depressurization of the reactor.

The LCO requires four divisions of RTS Automatic Trip Logic to be OPERABLE. Four OPERABLE divisions are provided to ensure that a random failure of a single logic channel will not prevent reactor trip.

These trip Functions must be OPERABLE in MODE 1 or 2 when the reactor is critical. In MODE 3, 4, or 5, these RTS trip Functions must be OPERABLE when the RTBs are closed and the PLS is capable of rod withdrawal.

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCOs, and APPLICABILITY (continued)

21. Core Makeup Tank (CMT) Actuation

The LCO requirement for this Function provides a reactor trip for any event that may initiate CMT injection.

The LCO requires four divisions of RTS Automatic Trip Logic to be OPERABLE. Four OPERABLE divisions are provided to ensure that random failure of a single logic channel will not prevent reactor trip.

These trip Functions must be OPERABLE in MODES 1 and 2 when the reactor is critical. In MODE 3, 4, and 5 these RTS trip Functions must be OPERABLE when the RTBs are closed and the PLS is capable of rod withdrawal.

The RTS instrumentation satisfies Criterion 3 of the NRC Policy Statement.

ACTIONS

A Note has been added in the ACTIONS to clarify the application of Completion Time rules. The Conditions of this Specification may be entered independently for each Function listed on Table 3.3.1-1.

In the event the transmitter, instrument loop, signal processing electronics, or trip output is found inoperable, then all affected Functions provided by that channel must be declared inoperable and the LCO Condition(s) entered for the protection Function(s) affected.

When the number of inoperable channels in a trip Function exceed those specified in one or other related Conditions associated with a trip Function, then the plant is outside the safety analysis. Therefore, LCO 3.0.3 must be immediately entered if applicable in the current MODE of operation.

A.1

Condition A applies to all RTS protection Functions. Condition A addresses the situation where one or more required channels for one or more Functions are inoperable at the same time. The Required Action is to refer to Table 3.3.1-1 and to take the Required Actions for the protection Functions affected. The Completion Times are those from the referenced Conditions and Required Actions.

(continued)

BASES

ACTIONS (continued)

B.1, B.2.1, and B.2.2

Condition B applies to the Manual Reactor Trip and Manual Safeguards Actuation in MODES 1 and 2 and in MODES 3, 4, and 5 with the reactor trip breakers closed and the plant control system capable of rod withdrawal. These Required Actions address inoperability of one manual initiation device of the Manual Reactor Trip Function and/or Manual Safeguards Actuation Function. One device consists of an actuation switch and the associated hardware (such as contacts and wiring) up to but not including the eight Reactor Trip Breakers. With one device inoperable, the inoperable device must be restored to OPERABLE status within 48 hours. In this Condition, the remaining OPERABLE device is adequate to perform the safety function.

If the manual Function(s) cannot be restored to OPERABLE status in the allowed 48 hour Completion Time, the unit must be brought to a MODE in which the requirement does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 additional hours (54 hours total time) followed by opening the RTBs within 1 additional hour (55 hours total time). The 6 additional hours to reach MODE 3 and the 1 hour to open the RTBs are reasonable, based on operating experience, to reach MODE 3 and open the RTBs from full power operation in an orderly manner and without challenging unit systems. With the RTBs open and the unit in MODE 3, this trip Function is no longer required to be OPERABLE.

C.1 and C.2

Condition C applies to the Manual Reactor Trip in MODES 3, 4, and 5 with the RTBs closed and the PLS capable of rod withdrawal. These Required Actions address inoperability of one manual initiation device of the Manual Reactor Trip Function. One device consists of an actuation switch and the associated hardware (such as contacts and wiring) up to but not including the eight Reactor Trip Breakers. With one device inoperable, the inoperable device must be restored to OPERABLE status within 48 hours. In this Condition, the remaining OPERABLE device is adequate to perform the safety function.

(continued)

BASES

ACTIONS

C.1 and C.2 (continued)

If the Manual Reactor Trip Function cannot be restored to OPERABLE status in the allowed 48 hour Completion Time, the unit must be placed in a MODE in which the requirement does not apply. To achieve this status, the RTBs must be opened within the next 1 hour. With the RTBs open, this Function is no longer required.

D.1.1, D.1.2, D.2.1, D.2.2, and D.3

Condition D applies to the Power Range Neutron Flux – High Function in MODES 1 and 2.

With one or two channels inoperable, the affected channel must be placed in a bypass condition within 6 hours. If one or two are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of the two remaining channels will not prevent the protective function). The 6 hours allowed to place the inoperable channel(s) in the bypassed condition is justified in Reference 7.

In addition to placing the inoperable channel(s) in the bypassed condition, THERMAL POWER must be reduced to ≤ 75% RTP within 12 hours. Reducing the power level prevents operation of the core with radial power distributions beyond the design limits. With one or two of the PMS power range detectors inoperable, partial radial power distribution monitoring capability is lost. However, the protective function would still function even with a single failure of one of the two remaining channels.

As an alternative to reducing power, the inoperable channel(s) can be placed in the bypassed condition within 6 hours and the QPTR monitored every 12 hours as per SR 3.2.4.2, QPTR verification. Calculating QPTR compensates for the lost monitoring capability and allows continued plant operation at power levels > 75% RTP. The 12 hour Frequency is consistent with LCO 3.2.4, "QUADRANT POWER TILT RATIO (QPTR)."

(continued)

BASES

ACTIONS

D.1.1, D.1.2, D.2.1, D.2.2, and D.3 (continued)

Required Action D.2.2 has been modified by a Note which only requires SR 3.2.4.2 to be performed if OPDMS and the Power Range Neutron Flux input to QPTR become inoperable. Power distribution limits are normally verified in accordance with LCO 3.2.5, "OPDMS - Monitored Power Distribution Parameters." However, if OPDMS becomes inoperable, then LCO 3.2.4, "Quadrant Power Tilt Ratio (QPTR)", becomes applicable. Failure of a component in the Power Range Neutron Flux Channel which renders the High Flux Trip Function inoperable may not affect the capability to monitor QPTR. If either OPDMS or the channel input to QPTR is OPERABLE, then performance of SR 3.2.4.2 once per 12 hours in not necessary.

As an alternative to the above Actions, the plant must be placed in a MODE where this Function is no longer required OPERABLE. Twelve hours are allowed to place the plant in MODE 3. This is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. If Required Actions cannot be completed within their allowed Completion Times, LCO 3.0.3 must be entered.

E.1 and E.2

Condition E applies to the following reactor trip Functions:

- Power Range Neutron Flux – Low;
- Overtemperature ΔT;
- Overpower ΔT;
- Power Range Neutron Flux – High Positive Rate;
- Pressurizer Pressure – High;
- SG Water Level – Low; and
- SG Water Level – High 2.

With one or two channels inoperable, the affected channels must be placed in a bypass condition within 6 hours. If one or two are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single

(continued)

BASES

ACTIONS

E.1 and E.2 (continued)

failure criterion (a failure in one of the three or one of the two remaining channels will not prevent the protective function). The 6 hours allowed to place the inoperable channel(s) in bypass is justified in Reference 7 with one required channel inoperable.

If the Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE. An additional 6 hours is allowed to place the unit in MODE 3. Six hours is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

F.1, F.2, and F.3

Condition F applies to the Intermediate Range Neutron Flux trip when above the P-6 setpoint and below the P-10 setpoint. Above the P-6 setpoint and below the P-10 setpoint, the PMS intermediate range detector performs the monitoring functions.

With one or two channels inoperable, the affected channels must be placed in a bypass condition within 2 hours. If one or two are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of the two remaining channels will not prevent the protective function). The 2 hours allowed to place the inoperable channel(s) in the bypassed condition is justified in Reference 7.

As an alternative to placing the channel(s) in bypass if THERMAL POWER is greater than the P-6 setpoint but less than the P-10 setpoint, 2 hours is allowed to reduce THERMAL POWER below the P-6 setpoint or to increase the THERMAL POWER above the P-10 setpoint. The PMS Intermediate Range Neutron Flux channels must be OPERABLE when the power level is above the capability of the source range, P-6, and below the capability of the power range, P-10. If THERMAL POWER is greater than the P-10 setpoint, the PMS power range detectors perform the monitoring and protective functions and the intermediate range is not required. The Completion Times allow for a slow and controlled power adjustment below P-6, and takes into

(continued)

BASES

ACTIONS

F.1, F.2, and F.3 (continued)

account the redundant capability afforded by the two remaining OPERABLE channels and the low probability of their failure during this period.

G.1 and G.2

Condition G applies to three Intermediate Range Neutron Flux trip channels inoperable in MODE 2 above the P-6 setpoint and below the P-10 setpoint. Required Actions specified in this Condition are only applicable when channel failures do not result in reactor trip. Above the P-6 setpoint and below the P-10 setpoint, the PMS intermediate range detector performs the monitoring Functions. With only one intermediate range channel OPERABLE, the Required Actions are to suspend operations involving positive reactivity additions immediately. This will preclude any power level increase since there are insufficient OPERABLE Intermediate Range Neutron Flux channels to adequately monitor the power rise. The operator must also reduce THERMAL POWER below the P-6 setpoint within 2 hours. Below P-6, the Source Range Neutron Flux channels will be able to monitor the core power level. The Completion Time of 2 hours will allow a slow and controlled power reduction to less than the P-6 setpoint and takes into account the low probability of occurrence of an event during this period that may require the protection afforded by the PMS Intermediate Range Neutron Flux trip.

H.1

Condition H applies to the Intermediate Range Neutron Flux trip when THERMAL POWER is below the P-6 setpoint and one or two channels is inoperable. Below the P-6 setpoint, the PMS source range performs the monitoring and protective functions. At least three of the four PMS intermediate range channels must be returned to OPERABLE status prior to increasing power above the P-6 setpoint. With the unit in this Condition, below P-6, the PMS source range performs the monitoring and protection functions.

(continued)

BASES

ACTIONS (continued)

I.1

Condition I applies to one or two Source Range Neutron Flux trip channels inoperable when in MODE 2, below the P-6 setpoint, and performing a reactor startup. With the unit in this Condition, below P-6, the PMS source range performs the monitoring and protection functions. With one or two of the four channels inoperable, operations involving positive reactivity additions shall be suspended immediately.

This will preclude any power escalation. With only two source range channels OPERABLE, core protection is severely reduced and any actions that add positive reactivity to the core must be suspended immediately.

J.1

Condition J applies to three inoperable Source Range Neutron Flux channels when in MODE 2, below the P-6 setpoint, and performing a reactor startup, or in MODE 3, 4, or 5 with the RTBs closed and the CRD System capable of rod withdrawal. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With three source range channels inoperable, the RTBs must be opened immediately. With the RTBs open, the core is in a more stable condition and the unit enters Condition T.

K.1 and K.2

Condition K applies to the following reactor trip Functions:

- Pressurizer Pressure – Low;
- Pressurizer Water Level – High 3;
- Reactor Coolant Flow – Low (Two Cold Legs);
- RCP Bearing Water Temperature – High (Two Pumps); and
- RCP Speed – Low.

With one or two channels inoperable, the affected channels must be placed in a bypass condition within 6 hours. If one or two are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of

(continued)

BASES

ACTIONS

K.1 and K.2 (continued)

the two remaining channels will not prevent the protective function). The 6 hours allowed to place the inoperable channel(s) in the bypassed condition is justified in Reference 7.

If Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE. A Completion Time of an additional 6 hours is allowed to reduce power < P-10. Allowance of this time interval takes into consideration the redundant capability provided by the remaining two redundant OPERABLE channels and the low probability of occurrence of an event during this period that may require the protection afforded by the Functions associated with Condition K.

L.1 and L.2

Condition L is applicable to the Reactor Coolant Flow – Low (Single Cold Leg) and RCP Bearing Water Temperature – High (Single Pump) reactor trip Functions.

With one or two channels inoperable, the affected channels must be placed in a bypass condition within 6 hours. If one or two are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of the two remaining channels will not prevent the protective function). The 6 hours allowed to place the inoperable channel(s) in the bypassed condition is justified in Reference 7.

If Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE. A Completion Time of an additional 4 hours is allowed to reduce power < P-8. Allowance of this time interval takes into consideration the redundant capability provided by the remaining two redundant OPERABLE channels and the low probability of occurrence of an event during this period that may require the protection afforded by this Function.

(continued)

BASES

ACTIONS (continued)

M.1 and M.2

Condition M applies to the Safeguards Actuation signal from ESFAS reactor trip, the RTS Automatic Trip Logic, automatic ADS Stages 1, 2, and 3 actuation, and automatic CMT injection in MODES 1 and 2.

With one or two channels or divisions inoperable, the Required Action is to restore three of the four channels/divisions within 6 hours. Restoring all channels/divisions but one to OPERABLE status ensures that a single failure will neither cause nor prevent the protective function. In addition, having only one channel/division inoperable, provides the capability for surveillance testing on the remaining three channels/divisions. The 6 hour Completion Time is considered reasonable since the protective function would still function even with a single failure of one of the two remaining channels/divisions.

If Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE. A Completion Time of an additional 6 hours is allowed to place the unit in MODE 3. The Completion Time is a reasonable time, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems. Allowance of this time interval takes into consideration the redundant capability provided by the remaining two redundant OPERABLE channels/divisions and the low probability of occurrence of an event during this period that may require the protection afforded by this Function.

N.1, N.2, and N.3

Condition N applies to the P-6, P-10, and P-11 interlocks. With one or two channels inoperable, the associated interlock must be verified to be in its required state for the existing plant condition within 1 hour, or the Functions associated with inoperable interlocks placed in a bypassed condition within 7 hours, or the unit must be placed in MODE 3 within 13 hours. Verifying the interlock manually accomplishes the interlock condition.

If one or two associated Functions are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of the two remaining channels will

(continued)

BASES

ACTIONS

N.1, N.2, and N.3 (continued)

not prevent the protective function). The 7 hours allowed to place the Functions associated with the inoperable channel(s) in the bypassed condition is justified in Reference 7.

If placing the associated Functions in bypass is impractical, for instance as the result of other channels in bypass, the Completion Time of an additional 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging plant systems.

O.1, O.2, and O.3

Condition O applies to the P-8 interlock. With one or two channels inoperable, the associated interlock must be verified to be in its required state for the existing plant condition within 1 hour, or the Functions associated with inoperable interlocks placed in a bypassed condition within 7 hours, or the unit must be placed in MODE 2 within 13 hours. Verifying the interlock manually accomplishes the interlock condition.

If one or two associated Functions are bypassed, the logic becomes two-out-of-three or one-out-of-two, respectively, while still meeting single failure criterion (a failure in one of the three or one of the two remaining channels will not prevent the protective function). The 7 hours allowed to place the Functions associated with the inoperable channel(s) in the bypassed condition is justified in Reference 7.

If placing the associated Functions in bypass is impractical, for instance as the result of other channels in bypass, the Completion Time of an additional 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power in an orderly manner and without challenging plant systems.

P.1, P.2.1, and P.2.2

Condition P applies to the RTBs, and RTB undervoltage and shunt trip mechanisms in MODES 1 and 2, and in MODES 3, 4, and 5 with the RTBs closed and the PLS capable of rod withdrawal. This Condition is primarily associated with mechanical damage that can prevent the RTBs from opening.

(continued)

BASES

ACTIONS

P.1, P.2.1, and P.2.2 (continued)

With one required division inoperable, the reactor trip breakers in the inoperable required division must be opened within 8 hours. The RTBs in the division not required to be OPERABLE should be maintained closed, regardless of their operability status, since opening of two divisions of RTBs will cause a reactor trip. A division is inoperable, if, within that division, one or both of the RTBs and/or one or both of the trip mechanisms is inoperable.

With one required division inoperable (with its RTBs open) and with two OPERABLE divisions remaining, the trip logic becomes one-out-of-two. The one-out-of-two trip logic meets the single failure criterion (a failure in one of the two remaining divisions will not prevent the protective function).

If Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE within an additional 6 hours. This is done by opening all of the RTBs. With the RTBs open, these Functions are no longer required.

Q.1, Q.2.1, and Q.2.2

Condition Q applies to the RTBs in MODES 1 and 2, and in MODES 3, 4, and 5 with the RTBs closed and the PLS capable of rod withdrawal. With three divisions of RTBs and/or RTB Undervoltage and Shunt Trip Mechanisms inoperable, 1 hour is allowed to restore the three of the four divisions to OPERABLE status or the unit must be placed in MODE 3, 4 or 5 and the RTBs opened within the next 6 hours. The Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power in an orderly manner and without challenging unit systems. The 1 hour and 6 hour Completion Times are equal to the time allowed by LCO 3.0.3 for shutdown actions in the event of a complete loss of RTS Function. Placing the unit in MODE 3 removes the requirement for this particular Function.

R.1 and R.2

Condition R applies to automatic ADS Stages 1, 2, and 3 Actuation, automatic CMT Actuation and the RTS Automatic Trip Logic in MODES 3, 4, and 5 with the RTBs closed and the PLS capable of rod withdrawal.

(continued)

BASES

ACTIONS

R.1 and R.2 (continued)

With one or two channels/divisions inoperable, three of the four channels/divisions must be restored to OPERABLE status in 48 hours. Restoring all channels but one to OPERABLE ensures that a single failure will neither cause nor prevent the protective function. In addition, having only one channel/division inoperable, provides the capability for surveillance testing on the remaining three channels/divisions. The 48 hour Completion Time is considered reasonable since the protective function would still function even with a single failure of one of the two remaining channels/divisions.

If Required Actions described above cannot be met within the specified Completion Times, the unit must be placed in a MODE where this Function is no longer required to be OPERABLE. A Completion Time of an additional 1 hour is allowed to open the RTBs. With RTBs open, these Functions are no longer required.

S.1 and S.2

Condition S applies to one or two inoperable Source Range Neutron Flux channels in MODE 3, 4, or 5 with the RTBs closed and the PLS capable of rod withdrawal. With the unit in this Condition, below P-6, the NIS source range performs the monitoring and protection functions. With one or two of the source range channels inoperable, 48 hours is allowed to restore three of the four channels to an OPERABLE status. If the channels cannot be returned to an OPERABLE status, 1 additional hour is allowed to open the RTBs. Once the RTBs are open, the core is in a more stable condition and the unit enters Condition L. The allowance of 48 hours to restore the channel to OPERABLE status, and the additional hour to open the RTBs, are justified in Reference 7.

T.1, T.2, and T.3

Condition T applies when the required Source Range Neutron Flux channel is inoperable in MODE 3, 4, or 5 with the RTBs open. With the unit in this Condition, the NIS source range performs the monitoring and protection functions. With the required source range channel inoperable, operations involving positive reactivity additions shall be suspended immediately. This will preclude any power escalation. In

(continued)

BASES

ACTIONS

T.1, T.2, and T.3 (continued)

addition to suspension of positive reactivity additions, all valves that could add unborated water to the RCS must be closed within 1 hour as specified in LCO 3.9.2. The isolation of unborated water sources will preclude a boron dilution accident.

Also, the SDM must be verified within 1 hour and once every 12 hours thereafter as per SR 3.1.1.1, SDM verification. With no source range channels OPERABLE, core protection is severely reduced. Verifying the SDM within 1 hour allows sufficient time to perform the calculations and determine that the SDM requirements are met. The SDM must also be verified once per 12 hours thereafter to ensure that the core reactivity has not changed. Required Action L.11 precludes any positive reactivity additions; therefore, core reactivity should not be increasing, and a 12 hour Frequency is adequate. The Completion Times of within 1 hour and once per 12 hours are based on operating experience in performing the Required Actions and the knowledge that unit conditions will change slowly.

SURVEILLANCE REQUIREMENTS

The SRs for each RTS Function are identified in the SRs column of Table 3.3.1-1 for that Function.

A Note has been added to the SR table stating that Table 3.3.1-1 determines which SRs apply to which RTS Functions.

The CHANNEL CALIBRATION and RTCOT are performed in a manner that is consistent with the assumptions used in analytically calculating the required channel accuracies. For channels that include dynamic transfer functions, such as, lag, lead/lag, rate/lag, the response time test may be performed with the transfer function set to one, with the resulting measured response time compared to the appropriate Chapter 7 response time (Ref. 2). Alternately, the response time test can be performed with the time constants set to their nominal value provided the required response time is analytically calculated assuming the time constants are set at their nominal values. The response time may be measured by a series of overlapping tests such that the entire response time is measured.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.1

Performance of the CHANNEL CHECK once every 12 hours ensures that gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of even something more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying that the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment have drifted outside its limit.

The channels to be checked are:

Power Range Neutron Flux
Intermediate Range Neutron Flux
Source Range Neutron Flux
Overtemperature Delta T
Overpower Delta T
Pressurizer Pressure
Pressurizer Water Level
Reactor Coolant Flow - each cold leg
RCP Bearing Water Temperature - each RCP
RCP Speed
SG Narrow Range Level - each SG
RCS Loop T-cold - each cold leg
RCS Loop T-hot - each cold leg

The Frequency is based on operating experience that demonstrates the channel failure is rare. Automated operator aids may be used to facilitate the performance of the CHANNEL CHECK.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.2

SR 3.3.1.2 compares the calorimetric heat balance to the nuclear instrumentation channel output every 24 hours. If the calorimetric measurement between 70% and 100% RTP, differs from the nuclear instrument channel output by > 2% RTP, the nuclear instrument channel is not declared inoperable, but must be adjusted. If the nuclear instrument channel output cannot be properly adjusted, the channel is declared inoperable.

Three Notes modify SR 3.3.1.2. The first Note indicates that the nuclear instrument channel output shall be adjusted consistent with the calorimetric results if the absolute difference between the nuclear instrument channel output and the calorimetric measurement between 70% and 100% RTP is > 2% RTP. The second Note clarifies that this Surveillance is required only if reactor power is ≥ 15% RTP and that 12 hours is allowed for performing the first Surveillance after reaching 15% RTP. At lower power levels the calorimetric data are inaccurate. The third Note is required because, at power levels between 15% and 70% calorimetric uncertainty and control rod insertion create the potential for miscalibration of the nuclear instrumentation channel in cases where the channel is adjusted downward to match the calorimetric power. Therefore, if the calorimetric heat measurement is less than 70% RTP, and if the nuclear instrumentation channel indicated power is lower than the calorimetric measurement by > 2%, then the nuclear instrumentation channel shall be adjusted upward to match the calorimetric measurement. No nuclear instrumentation channel adjustment is required if the nuclear instrumentation channel is higher than the calorimetric measurement (see Westinghouse Technical Bulletin NSD-TB-92-14, Rev. 1.)

The Frequency of every 24 hours is adequate. It is based on plant operating experience, considering instrument reliability and operating history data for instrument drift. Together these factors demonstrate the change in the absolute difference between nuclear instrumentation and heat balance calculated powers rarely exceeds 2% RTP in any 24 hours period.

In addition, main control room operators periodically monitor redundant indications and alarms to detect deviations in channel outputs.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.3

SR 3.3.1.3 compares the AXIAL FLUX DIFFERENCE determined using the incore system to the nuclear instrument channel AXIAL FLUX DIFFERENCE every 31 EFPD.

If the absolute difference is ≥ 3% AFD the nuclear instrument channel is still OPERABLE, but must be readjusted. If the nuclear instrument channel cannot be properly readjusted, the channel is declared inoperable. This surveillance is performed to verify the f(ΔI) input to the overtemperature ΔT function.

Two Notes modify SR 3.3.1.3. The first Note indicates that the excore nuclear instrument channel shall be adjusted if the absolute difference between the incore and excore AFD is ≥ 3% AFD. Note 2 clarifies that the Surveillance is required only if reactor power is ≥ 20% RTP and that 24 hours is allowed for performing the first Surveillance after reaching 20% RTP. Below 20% RTP, the design of the incore detector system, low core power density, and detector accuracy make use of the incore detectors inadequate for use as a reference standard for comparison to the excore channels.

The Frequency of every 31 EFPD is adequate. It is based on plant operating experience, considering instrument reliability and operating history data for instrument drift. Also, the slow changes in neutron flux during the fuel cycle can be detected during this interval.

SR 3.3.1.4

SR 3.3.1.4 is a calibration of the excore channels to the incore channels. If the measurements do not agree, the excore channels are not declared inoperable but must be calibrated to agree with the incore detector measurements. If the excore channels cannot be adjusted, the channels are declared inoperable. This Surveillance is performed to verify the f(ΔI) input to the overtemperature ΔT Function.

A Note modifies SR 3.3.1.4. The Note states that this Surveillance is required only if reactor power is > 50% RTP and that 24 hours is allowed for performing the first surveillance after reaching 50% RTP.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.4 (continued)

The Frequency of 92 EFPD is adequate. It is based on industry operating experience, considering instrument reliability and operating history data for instrument drift.

SR 3.3.1.5

SR 3.3.1.5 is the performance of a TADOT every 92 days on a STAGGERED TEST BASIS. This test shall verify OPERABILITY by actuation of the end devices.

The Reactor Trip Breaker (RTB) test shall include separate verification of the undervoltage and shunt trip mechanisms. Each RTB in a division shall be tested separately in order to minimize the possibility of an inadvertent trip.

The Frequency of every 92 days on a STAGGERED TEST BASIS is adequate. It is based on industry operating experience, considering instrument reliability and operating history data. In addition, the AP600 design provides additional breakers to enhance reliability.

The SR is modified by a Note to clarify that both breakers in a single division are to be tested during each STAGGERED TEST.

SR 3.3.1.6

SR 3.3.1.6 is the performance of a REACTOR TRIP CHANNEL OPERATIONAL TEST (RTCOT) every 92 days.

A RTCOT is performed on each required channel to provide reasonable assurance that the entire channel will perform the intended Function.

The automatic tester provided with the integrated protection cabinets is intended to aid the plant staff in performing the RTCOT. Prior to the RTCOT, the calibration of the automatic tester shall be verified and adjustments made as required to the voltage and time base references in the automatic tester.

Subsequent to the RTCOT, the results of the automatic test shall be reviewed to verify completeness and adequacy of results.

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BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.6 (continued)

This test frequency of 92 days is justified based on Reference 7 and the use of continuous diagnostic test features, such as deadman timers, A/D channel automatic calibration, memory checks, numeric coprocessor checks, and tests of timers, counters and crystal time bases, which will report a failure within the integrated protection cabinets to the operator within 10 minutes of a detectable failure.

SR 3.3.1.6 is modified by a note that provides a 4 hour delay in the requirement to perform this Surveillance for source range instrumentation when entering MODE 3 from MODE 2. This note allows a normal shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3 until the RTBs are open and SR 3.3.1.6 is no longer required to be performed. If the unit is to be in MODE 3 with the RTBs closed for a time greater than 4 hours, this Surveillance must be performed prior to 4 hours after entry into MODE 3.

During the RTCOT, the integrated protection cabinets in the division under test may be placed in bypass.

SR 3.3.1.7

SR 3.3.1.7 is the performance of a RTCOT as described in SR 3.3.1.6, except it is modified by a Note that this test shall include verification that the P-6 and P-10 interlocks are in their required state for the existing unit condition. The Frequency is modified by a Note that allows this surveillance to be satisfied if it has been performed within 92 days of the Frequencies prior to reactor startup and four hours after reducing power below P-10 and P-6. The Frequency of "prior to startup" ensures this surveillance is performed prior to critical operations and applies to the source, intermediate and power range low instrument channels. The Frequency of "4 hours after reducing power below P-10" (applicable to intermediate and power range low channels) and "4 hours after reducing power below P-6" (applicable to source range channels) allows a normal shutdown to be completed and the unit removed from the MODE of Applicability for this surveillance without a delay to perform the testing required by this surveillance. The Frequency of every 92 days thereafter applies if the plant remains in the MODE of Applicability after the initial performances of prior to reactor startup and four hours after reducing power below

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.7 (continued)

P-10 or P-6. The MODE of Applicability for this surveillance is < P-10 for the power range low and intermediate range channels and < P-6 for the source range channels. Once the unit is in MODE 3, this surveillance is no longer required. If power is to be maintained < P-10 or < P-6 for more than 4 hours, then the testing required by this surveillance must be performed prior to the expiration of the 4 hour limit. Four hours is a reasonable time to complete the required testing or place the unit in a MODE where this surveillance is no longer required. This test ensures that the NIS source, intermediate, and power range low channels are OPERABLE prior to taking the reactor critical and after reducing power into the applicable MODE (< P-10 or < P-6) for periods > 4 hours.

SR 3.3.1.8

A CHANNEL CALIBRATION is performed every 24 months, or approximately at every refueling. CHANNEL CALIBRATION is a complete check of the instrument loop, including the sensor. The test verifies that the channel responds to a measured parameter within the necessary range and accuracy.

Transmitter calibration must be performed consistent with the assumptions of the unit specific setpoint methodology. The difference between the current "as found" values and the previous test "as left" values must be consistent with the transmitter drift allowance used in the setpoint methodology.

The CHANNEL CALIBRATION is assisted by the use of an automatic tester, and the calibration of the automatic tester must be verified prior to use.

The setpoint methodology requires that 30 months drift be used (1.25 times the surveillance calibration interval, 24 months) based on Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-month Fuel Cycle."

SR 3.3.1.8 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable.

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