

December 23, 2015

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Subject: Application to Revise Technical Specifications to Adopt TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities," Revision 0, using the Consolidated Line Item Improvement Process

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to the Technical Specifications (TS) for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3.

The proposed amendment would revise PBAPS Limiting Condition for Operation (LCO) 3.10.1, and the associated Bases, to expand its scope to include provisions for temperature excursions greater than 212°F as a consequence of inservice leak and hydrostatic testing, and as a consequence of scram time testing initiated in conjunction with an inservice leak or hydrostatic test, while considering operational conditions to be in Mode 4. This change is consistent with NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities." The availability of TSTF-484, Revision 0, was announced in the Federal Register on October 27, 2006, (71 FR 63050) as part of the consolidated line item improvement process (CLIIP).

EGC has concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92.

The proposed changes have been reviewed by the PBAPS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

This amendment request contains no regulatory commitments.

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Attachment 1 provides an evaluation of the proposed change. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides the existing Bases pages marked up to show the proposed change (information only).

EGC requests approval of the proposed amendment by October 24, 2016, in support of the Unit 2 Fall 2016 Refueling Outage. Once approved, the amendment shall be implemented within 60 days of issuance.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the Commonwealth of Pennsylvania of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Official.

If you have any questions or require additional information, please contact Stephanie J. Hanson at (610) 765-5143.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of December 2015.

Respectfully,



David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachments: 1. Evaluation of Proposed Changes
2. Markup of Technical Specifications Pages
3. Markup of Technical Specifications Bases Pages (For Information Only)

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Senior Resident Inspector, PBAPS	"
	USNRC Project Manager, PBAPS	"
	R. R. Janati, Bureau of Radiation Protection	"
	S. T. Gray, State of Maryland	"

ATTACHMENT 1

Evaluation of Proposed Changes

Peach Bottom Atomic Power Station, Units 2 and 3

Renewed Facility Operating License Nos. DPR-44 and DPR-56

Docket Nos. 50-277 and 50-278

Subject: Application to Revise Technical Specifications to Adopt TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities," Revision 0, using the Consolidated Line Item Improvement Process

1.0 DESCRIPTION

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1.0 DESCRIPTION

The proposed amendment would revise Technical Specifications (TS) Limiting Condition for Operation (LCO) 3.10.1, and the associated Bases, to expand its scope to include provisions for temperature excursions greater than 212°F as a consequence of inservice leak and hydrostatic testing, and as a consequence of scram time testing initiated in conjunction with an inservice leak or hydrostatic test, while considering operational conditions to be in Mode 4. This change is consistent with NRC approved Revision 0 to Technical Specification Task Force (TSTF) Improved Standard Technical Specification Change Traveler, TSTF- 484, "Use of TS 3.10.1 for Scram Time Testing Activities." The availability of the TS 3.10.1 revision was announced in the Federal Register on October 27, 2006 (71 FR 63050) as part of the consolidated line item improvement process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Consistent with the NRC approved Revision 0 of TSTF-484, the proposed TS changes include a revised TS 3.10.1, "Inservice Leak and Hydrostatic Testing Operation." Proposed revisions to the TS Bases are also included in this application. Adoption of the TS Bases associated with TSTF-484, Revision 0 is an integral part of implementing this TS amendment. The changes to the affected TS Bases pages will be incorporated in accordance with the PBAPS TS Bases Control Program. This application is being made in accordance with the CLIP.

Exelon Generation Company, LLC (EGC) has reviewed the model safety evaluation dated October 27, 2006, as part of the Federal Register Notice of Availability. This review included a review of the NRC's evaluation, as well as the information provided in TSTF-484, Revision 0. As described in the subsequent paragraphs, EGC has concluded that the justifications presented in the TSTF-484, Revision 0 proposal and the model safety evaluation prepared by the NRC are applicable to Peach Bottom Atomic Power Station, Units 2 and 3 (PBAPS) and justify this amendment for incorporation of the changes to the plant Technical Specifications (TSs).

The model safety evaluation discusses the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). PBAPS is not licensed to the 10 CFR 50, Appendix A, GDC applicable to this change. PBAPS's Updated Final Safety Analysis Report (UFSAR), Appendix H, "Conformance to AEC (NRC) Criteria," provides an assessment against the draft GDC published in 1967. A review has determined that the plant-specific requirements are sufficiently similar to the Appendix A GDC as related to the proposed change. Therefore, the proposed changes are applicable to PBAPS.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on October 27, 2006 (71 FR 63050).

4.0 TECHNICAL ANALYSIS

EGC has reviewed the safety evaluation (SE) published on October 27, 2006 (71 FR 63050) as part of the CLIIP Notice of Availability. EGC has concluded that the technical justifications presented in the SE prepared by the NRC staff are applicable to PBAPS, Units 2 and 3, and therefore justify this amendment for the incorporation of the proposed changes to the PBAPS TS.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

EGC has reviewed the no significant hazards determination published on August 21, 2006 (71 FR 48561) as part of the CLIIP Notice for Comment. The no significant hazards determination was made available on October 27, 2006 (71 FR 63050) as part of the CLIIP Notice of Availability. EGC has concluded that the determination presented in the notice is applicable to PBAPS and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

5.2 Applicable Regulatory Requirement / Criteria

A description of the proposed TS change and its relationship to applicable regulatory requirements was provided in the NRC Notice of Availability published on October 27, 2006 (71 FR 63050).

6.0 PRECEDENCE

The proposed changes to TS LCO 3.10.1 are similar to changes previously approved by the NRC for a number of plants:

1. Letter from Brian Benney (U.S. Nuclear Regulatory Commission) to Nebraska Public Power District, "Cooper Nuclear Station – Issuance of Amendment Re: Technical Specification Change Request for TS 3.10.1, Scram Time Testing Activities (TAC NO. MD2418)," dated October 23, 2006.
2. Letter from Bhalchandra Vaidya, (U.S. Nuclear Regulatory Commission) to Entergy Operations, Inc., "Grand Gulf Nuclear Station, Unit 1 – Issuance of Amendment Re: Technical Specification (TS) to Adopt Task Force (TSTF)-484, Revision 0, "Use of TS 3.10.1, for Scram Time Testing Activities," using the Consolidated Line Item Improvement Process (TAC NO. MD3578)," dated February 21, 2007.
3. Letter from James Kim, (U.S. Nuclear Regulatory Commission) to Entergy Nuclear Operations, Inc., "Pilgrim Nuclear Power Station – Issuance of Amendment Re: Adoption of Technical Specification Task Force (TSTF) Change TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities" (TAC NO. MD4085)," dated March 26, 2007.
4. Letter from Eva A. Brown (U.S. Nuclear Regulatory Commission) to Tennessee Valley Authority, "Browns Ferry Nuclear Plant, Units 1, 2 and 3 – Issuance of Amendments

Regarding Scram Time Testing Activities (TAC NOS. MD3921, MD3922, MD3923) (TS-456)," dated April 16, 2007.

5. Letter from Robert E. Martin, (U.S. Nuclear Regulatory Commission) to Edwin I. Hatch Nuclear Plant, "Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2, Issuance of Amendments Regarding Technical Specification Task Force (TSTF) Change TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities" (TAC NOS. MD4225 and MD4226)," dated May 17, 2007.
6. Letter from John P. Boska (U.S. Nuclear Regulatory Commission) to Entergy Nuclear Operations, Inc., "James A. Fitzpatrick Nuclear Power Plant – Issuance of Amendment Re: Technical Specification 3.10.1, Inservice Leak and Hydrostatic Testing Operation, Consistent with Technical Specification Task Force-484 (TAC NO. MD4582)," dated June 21, 2007.
7. Letter from Richard V. Guzman (U.S. Nuclear Regulatory Commission) to PPL Susquehanna, LLC, "Susquehanna Steam Electric Station, Units 1 and 2 – Issuance of Amendment Re: Implementation of Technical Specification Task Force (TSTF)-484 – Use of TS 3.10.1 for Scram Time Testing (TAC NOS. MD5897 and MD5898)," dated December 20, 2007.
8. Letter from Marshall J. David (U.S. Nuclear Regulatory Commission) to Nine Mile Point Nuclear Station, LLC, "Nine Mile Point Nuclear Station, Unit No. 2 – Issuance of Amendment Re: Technical Specification Change for Scram Time Testing Activities, using the Consolidated Line Item Improvement Process (TAC NO. MD6903)," dated February 7, 2008.
9. Letter from Carl F. Lyon (U.S. Nuclear Regulatory Commission) to Energy Northwest, "Columbia Generating Station – Issuance of Amendment Re: Adoption of TSTF-484, "Use of TS 3.10.1 for Scram Time Testing" (TAC NO. MD8687)," dated September 16, 2008.
10. Letter from Farideh E. Saba (U.S. Nuclear Regulatory Commission) to Carolina Power & Light Company, "Brunswick Steam Electric Plant , Units 1 and 2 Issuance of Amendments Regarding the Adoption of Technical Specification Task Force (TSTF) Standard TS Change Traveler, TSTF-484, Revision 0 (TAC NOS. MD8994, MD8995)," dated December 9, 2008.
11. Letter from Alan B. Wang (U.S. Nuclear Regulatory Commission) to Entergy Operations, Inc., "River Bend Station, Unit 1 – Issuance of Amendment Re: Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Change Traveler, TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities" (TAC NO. ME4431)," dated January 5, 2011.
12. Letter from Michael Mahoney (U.S. Nuclear Regulatory Commission) to FirstEnergy Nuclear Operating Company, "Perry Nuclear Power Plant, Unit No. 1 – Issuance of Amendment Re: Revise Technical Specification 3.10.1 "Inservice Leak and Hydrostatic Testing Operation" (TAC NO. ME8048)," dated April 18, 2013.
13. Letter from Terry A. Beltz (U.S. Nuclear Regulatory Commission) to Northern States Power Company – Minnesota, "Monticello Nuclear Generating Plant – Issuance of Amendment No. 174 to Adopt Technical Specifications Task Force (TSTF) Traveler TSTF-

484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities (TAC NO. MF0362," dated August 9, 2013.

14. Letter from Blake Purnell (U.S. Nuclear Regulatory Commission) to Exelon Generation Company, LLC, "Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; and Quad Cities Nuclear Power Station Units 1 and 2 – Issuance of Amendments to Add Technical Specification 3.10.8, Inservice Leak and Hydrostatic Testing Operations" (CAC NOS. MF5471-MF5476)," dated December 17, 2015.

7.0 ENVIRONMENTAL CONSIDERATION

EGC has reviewed the environmental evaluation included in the safety evaluation (SE) published on October 27, 2006 (71 FR 63050) as part of the CLIIP Notice of Availability. EGC has concluded that the staff's findings presented in that evaluation are applicable to PBAPS Units 2 and 3, and the evaluation is hereby incorporated by reference for this application.

8.0 REFERENCES

1. Federal Register Notice, Notice of Availability published on October 27, 2006 (71 FR 63050).
2. Federal Register Notice, Notice for Comment published on August 21, 2006 (71 FR 48561).
3. TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities," dated October 27, 2006.

ATTACHMENT 2

Markup of Technical Specifications Pages

Peach Bottom Atomic Power Station Units 2 and 3

Renewed Facility Operating License Nos. DPR-44 and DPR-56

Docket Nos. 50-277 and 50-278

Revised Technical Specifications Pages

Unit 2 TS Page

3.10-1

Unit 3 TS Page

3.10-1

3.10 SPECIAL OPERATIONS

3.10.1 Inservice Leak and Hydrostatic Testing Operation

LCO 3.10.1 The average reactor coolant temperature specified in Table 1.1-1 for MODE 4 may be changed to "NA," and operation considered not to be in MODE 3; and the requirements of LCO 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System—Cold Shutdown," may be suspended, ~~to allow performance of an inservice leak or hydrostatic test provided the following MODE 3 LCOs are met:~~

provided the following MODE 3 LCOs are met:

- a. LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation," Functions 1, 3, and 4 of Table 3.3.6.2-1;
- b. LCO 3.6.4.1, "Secondary Containment";
- c. LCO 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs)"; and
- d. LCO 3.6.4.3, "Standby Gas Treatment (SGT) System."

APPLICABILITY: MODE 4 with average reactor coolant temperature > 212°F.

to allow reactor coolant temperature > 212°F:

- For performance of an inservice leak or hydrostatic test,
- As a consequence of maintaining adequate pressure for an inservice leak or hydrostatic test, or
- As a consequence of maintaining adequate pressure for control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

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- a. LCO 3.3.6.2, "Secondary Containment Isolation Instrumentation," Functions 1, 3, and 4 of Table 3.3.6.2-1;
- b. LCO 3.6.4.1, "Secondary Containment";
- c. LCO 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs)"; and
- d. LCO 3.6.4.3, "Standby Gas Treatment (SGT) System."

APPLICABILITY: MODE 4 with average reactor coolant temperature > 212°F.

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- For performance of an inservice leak or hydrostatic test,
- As a consequence of maintaining adequate pressure for an inservice leak or hydrostatic test, or
- As a consequence of maintaining adequate pressure for control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

ATTACHMENT 3

Markup of Technical Specifications Bases Pages (For Information Only)

Peach Bottom Atomic Power Station Units 2 and 3

Renewed Facility Operating License Nos. DPR-44 and DPR-56

Docket Nos. 50-277 and 50-278

Revised Technical Specifications Bases Pages

Unit 2 TS Bases Page

B 3.10.1

B 3.10-3

Unit 3 TS Bases Page

B 3.10.1

B 3.10-3

B 3.10 SPECIAL OPERATIONS

B 3.10.1 Inservice Leak and Hydrostatic Testing Operation

BASES

BACKGROUND

The purpose of this Special Operations LCO is to allow certain reactor coolant pressure tests to be performed in MODE 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) or plant temperature control capabilities during these tests require the pressure testing at temperatures > 212°F (normally corresponding to MODE 3).

Inservice hydrostatic testing and system leakage pressure tests required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Ref. 1) are performed prior to the reactor going critical after a refueling outage. Recirculation pump operation and a water solid RPV (except for an air bubble for pressure control) are used to achieve the necessary temperatures and pressures required for these tests. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.4.9, "Reactor Coolant System (RCS) Pressure and Temperature (P/T) Limits." These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence.

With increased reactor vessel fluence over time, the minimum allowable vessel temperature increases at a given pressure. Periodic updates to the RCS P/T limit curves are performed as necessary, based upon the results of analyses of irradiated surveillance specimens removed from the vessel. Hydrostatic and leak testing may eventually be required with minimum reactor coolant temperatures > 212°F.

Insert 1

Insert 2

APPLICABLE SAFETY ANALYSES

Allowing the reactor to be considered in MODE 4 ~~during hydrostatic or leak testing~~, when the reactor coolant temperature is > 212°F, effectively provides an exception to MODE 3 requirements, including OPERABILITY of primary containment and the full complement of redundant Emergency Core Cooling Systems. Since the ~~hydrostatic or leak tests~~ are performed nearly water solid (except for an air bubble for pressure control), at low decay heat values, and near MODE 4 conditions, the stored energy in the reactor core will be very low. Under these conditions, the potential for

during, or as a consequence of, hydrostatic or leak testing, or as a consequence of control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

(continued)

BASES

LCO
(continued)

limits, however, which require testing at temperatures > 212°F, while the ASME inservice test itself requires the safety/relief valves to be gagged, preventing their OPERABILITY. ← **Insert 3**

If it is desired to perform these tests while complying with this Special Operations LCO, then the MODE 4 applicable LCOs and specified MODE 3 LCOs must be met. This Special Operations LCO allows changing Table 1.1-1 temperature limits for MODE 4 to "NA" and suspending the requirements of LCO 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System—Cold Shutdown." The additional requirements for secondary containment LCOs to be met will provide sufficient protection for operations at reactor coolant temperatures > 212°F for the purpose of performing ~~either~~ an inservice leak or hydrostatic test. ←

, and for control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test.

This LCO allows primary containment to be open for frequent unobstructed access to perform inspections, and for outage activities on various systems to continue consistent with the MODE 4 applicable requirements ~~that are in effect immediately prior to and immediately after this operation.~~

, or as a consequence of,

APPLICABILITY

The MODE 4 requirements may only be modified for the performance of ~~inservice leak or hydrostatic tests~~ so that these operations can be considered as in MODE 4, even though the reactor coolant temperature is > 212°F. The additional requirement for secondary containment OPERABILITY according to the imposed MODE 3 requirements provides conservatism in the response of the unit to any event that may occur. Operations in a | other MODES are unaffected by this LCO.

, or as a consequence of control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

ACTIONS

A Note has been provided to modify the ACTIONS related to inservice leak and hydrostatic testing operation. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for each requirement of the LCO not met provide appropriate

(continued)

B 3.10 SPECIAL OPERATIONS

B 3.10.1 Inservice Leak and Hydrostatic Testing Operation

BASES

BACKGROUND

The purpose of this Special Operations LCO is to allow certain reactor coolant pressure tests to be performed in MODE 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) or plant temperature control capabilities during these tests require the pressure testing at temperatures > 212°F (normally corresponding to MODE 3).

Inservice hydrostatic testing and system leakage pressure tests required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Ref. 1) are performed prior to the reactor going critical after a refueling outage. Recirculation pump operation and a water solid RPV (except for an air bubble for pressure control) are used to achieve the necessary temperatures and pressures required for these tests. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.4.9, "Reactor Coolant System (RCS) Pressure and Temperature (P/T) Limits." These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence.

Insert 1

With increased reactor vessel fluence over time, the minimum allowable vessel temperature increases at a given pressure. Periodic updates to the RCS P/T limit curves are performed as necessary, based upon the results of analyses of irradiated surveillance specimens removed from the vessel. Hydrostatic and leak testing may eventually be required with minimum reactor coolant temperatures > 212°F.

Insert 2

APPLICABLE
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Allowing the reactor to be considered in MODE 4 ~~during hydrostatic or leak testing~~, when the reactor coolant temperature is > 212°F, effectively provides an exception to MODE 3 requirements, including OPERABILITY of primary containment and the full complement of redundant Emergency Core Cooling Systems. Since the ~~hydrostatic or leak tests~~ are performed nearly water solid (except for an air bubble for pressure control), at low decay heat values, and near MODE 4 conditions, the stored energy in the reactor core will be very low. Under these conditions, the potential for

during, or as a consequence of, hydrostatic or leak testing, or as a consequence of control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

(continued)

BASES

LCO
(continued)

limits, however, which require testing at temperatures > 212°F, while the ASME inservice test itself requires the safety/relief valves to be gagged, preventing their OPERABILITY. ← **Insert 3**

If it is desired to perform these tests while complying with this Special Operations LCO, then the MODE 4 applicable LCOs and specified MODE 3 LCOs must be met. This Special Operations LCO allows changing Table 1.1-1 temperature limits for MODE 4 to "NA" and suspending the requirements of LCO 3.4.8, "Residual Heat Removal (RHR) Shutdown Cooling System—Cold Shutdown." The additional requirements for secondary containment LCOs to be met will provide sufficient protection for operations at reactor coolant temperatures > 212°F for the purpose of performing ~~either~~ an inservice leak or hydrostatic test. ←

, and for control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test.

This LCO allows primary containment to be open for frequent unobstructed access to perform inspections, and for outage activities on various systems to continue consistent with the MODE 4 applicable requirements ~~that are in effect immediately prior to and immediately after this operation.~~

APPLICABILITY

The MODE 4 requirements may only be modified for the performance of ~~inservice leak or hydrostatic tests~~ so that these operations can be considered as in MODE 4, even though the reactor coolant temperature is > 212°F. The additional requirement for secondary containment OPERABILITY according to the imposed MODE 3 requirements provides conservatism in the response of the unit to any event that may occur. Operations in all other MODES are unaffected by this LCO.

, or as a consequence of,

, or as a consequence of control rod scram time testing initiated in conjunction with an inservice leak or hydrostatic test,

ACTIONS

A Note has been provided to modify the ACTIONS related to inservice leak and hydrostatic testing operation. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for each requirement of the LCO not met provide appropriate

(continued)

PBAPS Unit 2 and Unit 3 TSB Insertions

Insert 1:

or to allow completing these reactor coolant pressure tests when the initial conditions do not require temperatures > 212°F. Furthermore, the purpose is to allow continued performance of control rod scram time testing required by SR 3.1.4.1 or SR 3.1.4.4 if reactor coolant temperatures exceed 212°F when the control rod scram time testing is initiated in conjunction with an inservice leak or hydrostatic test. These control rod scram time tests would be performed in accordance with LCO 3.10.4, "Single Control Rod Withdrawal – Cold Shutdown," during MODE 4 operation.

Insert 2:

However, even with required minimum reactor coolant temperatures < 212°F, maintaining RCS temperatures within a small band during the test can be impractical. Removal of heat addition from recirculation pump operation and reactor core decay heat can be coarsely controlled by control rod drive hydraulic system flow and reactor water cleanup system non-regenerative heat exchanger operation. Test conditions are focused on maintaining a steady state pressure, and tightly limited temperature control poses an unnecessary burden on the operator and may not be achievable in certain instances.

The hydrostatic and RCS system leakage tests require increasing pressure to approximately 1000 psig. Scram time testing required by SR 3.1.4.1 and SR 3.1.4.4 requires reactor pressures \geq 800 psig.

Other testing may be performed in conjunction with the allowances for inservice leak or hydrostatic tests and control rod scram time tests.

Insert 3:

Additionally, even with required minimum reactor coolant temperatures < 212°F, RCS temperatures may drift above 212°F during the performance of inservice leak and hydrostatic testing or during subsequent control rod scram time testing, which is typically performed in conjunction with inservice leak and hydrostatic testing. While this Special Operations LCO is provided for inservice leak and hydrostatic testing, and for scram time testing initiated in conjunction with an inservice leak or hydrostatic test, parallel performance of others tests and inspections is not precluded.