ENCLOSURE 4

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
REPLACEMENT OF NUCLEAR INSTRUMENTATION SYSTEM SOURCE AND
INTERMEDIATE RANGE CHANNELS AND POST-ACCIDENT NEUTRON FLUX
MONJTORING SYSTEM

MARKED-UP REVISIONS TO
TECHNICAL SPECIFICATION
AND BASES PAGES

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.3.1.8	----------NOTE---------- Only required when not performed within previous 31 days. ---------- Perform COT.	Prior to Reactor Startup
SR 3.3.1.9	----------NOTE---------- Verification of setpoint is not required. ---------- Perform TADOT.	92 days
SR 3.3.1.10	----------NOTE---------- This Surveillance shall include verification that the time constants are adjusted to the prescribed values. ---------- Perform CHANNEL CALIBRATION.	18 months
SR 3.3.1.11	----------NOTES---------- 1. Neutron detectors are excluded from CHANNEL CALIBRATION. ~~2. Power and Intermediate Range detector plateau voltage verification is not required to be performed prior to entry into MODES 2 and 1.~~ ---------- Perform CHANNEL CALIBRATION.	18 months

(continued)

Table 3.3.1-1 (page 1 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
1. Manual Reactor Trip	1,2	2	B	SR 3.3.1.13	NA	NA
	3(a), 4(a), 5(a)	2	C	SR 3.3.1.13	NA	NA
2. Power Range Neutron Flux						
a. High	1,2	4	D	SR 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7 SR 3.3.1.11 SR 3.3.1.15	≤ 111.3% RTP	109% RTP
b. Low	1(b), 2	4	E	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.15	≤ 27.3% RTP	25% RTP
3. Power Range Neutron Flux High Positive Rate	1,2	4	E	SR 3.3.1.7 SR 3.3.1.11	≤ 6.3% RTP with time constant ≥ 2 sec	5% RTP with time constant ≥ 2 sec
4. Intermediate Range Neutron Flux	1(b), 2(c)	2	F,G	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ ~~34.4%~~ 41.9% RTP	25% RTP
	2(d)	2	H	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ ~~34.4%~~ 41.9% RTP	25% RTP

(continued)

(a) With Reactor Trip Breakers (RTBs) closed and Rod Control System capable of rod withdrawal.

(b) Below the P-10 (Power Range Neutron Flux) interlocks.

(c) Above the P-6 (Intermediate Range Neutron Flux) interlocks.

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is readjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 2 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
5. Source Range Neutron Flux	2(d)	2	J	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 ~~SR 3.3.1.15~~	≤ ~~1.4~~ 1.7 E5 cps	1.0 E5 cps
	3(a), 4(a), 5(a)	2	J,K	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.11 ~~SR 3.3.1.15~~	≤ ~~1.4~~ 1.7 E5 cps	1.0 E5 cps
	3(e), 4(e), 5(e)	1	L	SR 3.3.1.1 SR 3.3.1.11	NA	NA
6. Overtemperature ΔT	1,2	4	E	SR 3.3.1.1 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.15	Refer to Note 1 (Page 3.3-20)	Refer to Note 1 (Page 3.3-20)
7. Overpower ΔT	1,2	4	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.15	Refer to Note 2 (Page 3.3-21)	Refer to Note 2 (Page 3.3-21)

(continued)

(a) With RTBs closed and Rod Control System capable of rod withdrawal.

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(e) With the RTBs open. In this condition, source range function does not provide reactor trip but does provide input to the High Flux at Shutdown Alarm System (LCO 3.3.8) and indication.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is readjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 5 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
14. Turbine Trip						
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 SR 3.3.1.16	≥ 500 psig	580 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.14	≥ 90% open	96.7% open
15. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	Q	SR 3.3.1.13	NA	NA
16. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(d)	2	R	SR 3.3.1.11 SR 3.3.1.12	~~≤ 6E-11 amp~~ ≥ 1.2E-5% RTP	~~1E-10 amp~~ 2.0E-5% RTP
b. Low Power Reactor Trips Block, P-7	1	1 per train	S	SR 3.3.1.5	NA	NA
c. Power Range Neutron Flux, P-8	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 50.3% RTP	48% RTP
d. Power Range Neutron Flux, P-9	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 52.3% RTP	50% RTP
e. Power Range Neutron Flux, P-10 and input to P-7	1,2	4	R	SR 3.3.1.11 SR 3.3.1.12	(l,m)	(l,m)
f. Turbine Impulse Pressure, P-13	1	2	S	SR 3.3.1.10 SR 3.3.1.12	≤ 12.3% Impulse Pressure Equivalent turbine	10% Impulse Pressure Equivalent turbine

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(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(j) Above the P-9 (Power Range Neutron Flux) interlock.

(l) For the P-10 input to P-7, the Allowable Value is ≤ 12.3% RTP and the Nominal Trip Setpoint is 10% RTP.

(m) For the Power Range Neutron Flux, P-10, the Allowable Value is ≥ 7.7% RTP and the Nominal Trip Setpoint is 10% RTP.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

4. Intermediate Range Neutron Flux (continued)

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 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 NIS intermediate range ~~detectors cannot detect neutron levels present in this MODE.~~ indication is typically low off-scale in this MODE.

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip (NI-0031B, D, & E, NI-0032B, D, & G) Function ensures that protection is provided against an uncontrolled RCCA 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 NIS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS source range detectors do not provide any inputs to control systems. The source range trip is the only RTS automatic protection 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 two channels of Source Range Neutron Flux to be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function. The LCO also requires two channels of the Source Range Neutron Flux to be OPERABLE in MODE 3, 4, or 5 with RTBs closed.

The Source Range Neutron Flux Function provides protection for control rod withdrawal from

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

5. Source Range Neutron Flux (continued)

subcritical, boron dilution (see LCO 3.3.8) and control rod ejection events. The Function also provides visual neutron flux indication in the control room.

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 ~~NIS source range detectors are de-energized and inoperable.~~ Source Range Neutron Flux trip is blocked.

In MODE 3, 4, or 5 with the reactor shut down, the Source Range Neutron Flux trip Function must also be OPERABLE. If the Rod Control System 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 Rod Control System is not capable of rod withdrawal, the source range detectors are not required to trip the reactor. Source range detectors also function to monitor for high flux at shutdown. This function is addressed in Specification 3.3.8. Requirements for the source range detectors in MODE 6 are addressed in LCO 3.9.3.

6. Overtemperature ΔT

The Overtemperature ΔT trip Function (TDI-0411C, TDI-0421C, TDI-0431C, TDI-0441C, TDI-0411A, TDI-0421A, TDI-0431A, TDI-0441A) 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 pressure, coolant temperature, axial power distribution, and reactor power as indicated by loop ΔT 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 Function monitors both variation in power and flow since a decrease in flow

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

16. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current unit status. They back up operator actions to ensure protection system Functions are not bypassed during unit conditions under which the safety analysis assumes the Functions are not bypassed. 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 (NI-0035B, D, & E, NI-0036B, D, & G) is actuated when any NIS intermediate range channel goes approximately one decade above the minimum channel reading. If both channels drop below the setpoint, the permissive will automatically be defeated. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

- on increasing power, the P-6 interlock allows the manual block of the NIS 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; and~~

- on decreasing power, the P-6 interlock automatically ~~energizes the NIS source range detectors and~~ enables the NIS Source Range Neutron Flux reactor trip.

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

d. Power Range Neutron Flux, P-9 (continued)

reactor is not at a power level sufficient to have a load rejection beyond the capacity of the Steam Dump System.

e. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock (NI-0041B & C, NI-0042B & C, NI-0043B & C, NI-0044B & C) is actuated at approximately 10% power, as determined by two-out-of-four NIS power range detectors. If power level falls below 10% RTP on 3 of 4 channels, the nuclear instrument trips will be automatically unblocked. The LCO requirement for the P-10 interlock ensures that the following Functions are performed:

- on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip. Note that blocking the reactor trip also blocks the signal to prevent automatic and manual rod withdrawal;
- on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux — Low reactor trip;
- on increasing power, the P-10 interlock automatically provides a backup signal to block the Source Range Neutron Flux reactor trip; ~~and also to de-energize the NIS source range detectors;~~
- the P-10 interlock provides one of the two inputs to the P-7 interlock; and
- 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).

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.10

A CHANNEL CALIBRATION is performed every 18 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.

CHANNEL CALIBRATIONS 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 drift allowance used in the setpoint methodology.

The Frequency of 18 months is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology for some instrument functions, and the need to perform this Surveillance for some instrument functions under the conditions that apply during a plant outage and the potential for an unplanned plant transient if the Surveillance were performed at power. Operating experience has shown these components usually pass the Surveillance when performed on the 18 month Frequency.

SR 3.3.1.10 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable.

SR 3.3.1.11

a Note that

SR 3.3.1.11 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every 18 months. This SR is modified by ~~two Notes. Note 1~~ states that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the power range neutron detectors ~~consists of~~ includes a normalization of the detectors based on a power 75% calorimetric and flux map performed above ~~50%~~ RTP. The CHANNEL CALIBRATION for the source range ~~and intermediate range~~ neutron detectors ~~consists of~~ includes obtaining the detector ~~plateau or~~ preamp discriminator curves and evaluating those curves. ~~Note 2 states that the plateau voltage verification~~

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.11 (continued)

~~is not required for the NIS power range and intermediate detectors for entry into MODE 2 or 1 because the unit must be in at least MODE 2 to perform the test for the intermediate range detectors and MODE 1 for the power range detectors.~~ The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed on the 18 month Frequency.

SR 3.3.1.12

SR 3.3.1.12 is the performance of a COT of RTS interlocks every 18 months.

The Frequency is based on the known reliability of the interlocks and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.1.13

SR 3.3.1.13 is the performance of a TADOT of the Manual Reactor Trip and the SI Input from ESFAS. This TADOT is as described in SR 3.3.1.4, except that the test is performed every 18 months.

The manual reactor trip TADOT shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the manual reactor trip function. This test shall also verify the OPERABILITY of the Bypass breaker trip circuit(s), including the automatic undervoltage trip.

The Frequency is based on the known reliability of the Functions and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

(continued)

B 3.3 INSTRUMENTATION

B 3.3.8 High Flux at Shutdown Alarm (HFASA)

BASES

BACKGROUND

The primary purpose of the HFASA is to warn the operator of an unplanned boron dilution event in sufficient time (15 minutes prior to loss of shutdown margin) to allow manual action to terminate the event. The HFASA is used for this purpose in MODES 3 and 4, and MODE 5 with the loops filled.

The HFASA consists of two channels of alarms, with each channel receiving input from one source range channel. An alarm setpoint of $\leq$ 2.3 times background provides at least 15 minutes from the time the HFASA occurs to the total loss of shutdown margin due to an unplanned dilution event. This meets the Standard Review Plan criteria for mitigating the consequences of an unplanned dilution event by relying on operator action.

APPLICABLE SAFETY ANALYSES

The analysis presented in Reference 1 identifies credible boron dilution initiators. Time intervals from the HFASA until loss of shutdown margin were calculated. The results demonstrate that sufficient time for operator response is available to terminate an inadvertent dilution event taking credit for one HFASA with a setpoint of $\leq$ 2.3 times background.

The HFASA satisfied Criterion 3 of the NRC Policy Statement.

LCO

The LCO requires two channels of HFASA to be OPERABLE with input from two source range channels to provide protection against single failure.

APPLICABILITY

The HFASA must be OPERABLE in MODES 3, 4, and 5.

The Applicability is modified by a Note which allows the HFASA to be blocked in MODE 3 during reactor startup so that spurious alarms are not generated.

(continued)

B 3.9 REFUELING OPERATIONS

B 3.9.3 Nuclear Instrumentation

BASES

BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors (NI-0031 and NI-0032) are part of the Nuclear Instrumentation System (NIS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core. Temporary neutron flux detectors which provide equivalent indication may be utilized in place of installed instrumentation.

The installed source range neutron flux monitors are ~~BF3~~ fission chamber detectors, ~~operating in the proportional region of the gas filled detector characteristic curve.~~ The detectors monitor the neutron flux in counts per second. The instrument range covers ~~six~~ seven decades of neutron flux (~~1E+6 cps~~ (1E-1 cps to 1E+6 cps)) with a ~~5%~~ 2% instrument accuracy. The detectors also provide continuous visual indication in the control room. The NIS is designed in accordance with the criteria presented in Reference 1.

APPLICABLE SAFETY ANALYSES

Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as an improperly loaded fuel assembly. The need for a safety analysis for an uncontrolled boron dilution accident is minimized by isolating all unborated water sources except as provided for by LCO 3.9.2, "Unborated Water Source Isolation Valves."

The source range neutron flux monitors satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that two source range neutron flux monitors be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity. To be OPERABLE each monitor must provide visual indication.

(continued)

BASES

ACTIONS

B.2 (continued)

are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of once per 12 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration and to ensure that unplanned changes in boron concentration would be identified. The 12 hour Completion Time is reasonable, considering the low probability of a change in core reactivity during this time period.

SURVEILLANCE REQUIREMENTS

SR 3.9.3.1

SR 3.9.3.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation."

SR 3.9.3.2

SR 3.9.3.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors ~~consists of~~ includes obtaining the detector ~~plateau or~~ preamp discriminator curves and evaluating those curves. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

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ENCLOSURE 5

VOGTLE ELECTRIC GENERATING PLANT
REQUEST TO REVISE TECHNICAL SPECIFICATIONS
REPLACEMENT OF NUCLEAR INSTRUMENTATION SYSTEM SOURCE AND
INTERMEDIATE RANGE CHANNELS AND POST-ACCIDENT NEUTRON FLUX
MONITORING SYSTEM

TYPED REVISED TECHNICAL SPECIFICATION
AND BASES PAGES

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
SR 3.3.1.8	----------NOTE---------- Only required when not performed within previous 31 days. ---------- Perform COT.	Prior to Reactor Startup
SR 3.3.1.9	----------NOTE---------- Verification of setpoint is not required. ---------- Perform TADOT.	92 days
SR 3.3.1.10	----------NOTE---------- This Surveillance shall include verification that the time constants are adjusted to the prescribed values. ---------- Perform CHANNEL CALIBRATION.	18 months
SR 3.3.1.11	----------NOTE---------- Neutron detectors are excluded from CHANNEL CALIBRATION. ---------- Perform CHANNEL CALIBRATION.	18 months

(continued)

Table 3.3.1-1 (page 1 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
1. Manual Reactor Trip	1,2	2	B	SR 3.3.1.13	NA	NA
	3(a), 4(a), 5(a)	2	C	SR 3.3.1.13	NA	NA
2. Power Range Neutron Flux						
a. High	1,2	4	D	SR 3.3.1.1 SR 3.3.1.2 SR 3.3.1.7 SR 3.3.1.11 SR 3.3.1.15	≤ 111.3% RTP	109% RTP
b. Low	1(b),2	4	E	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.15	≤ 27.3% RTP	25% RTP
3. Power Range Neutron Flux High Positive Rate	1,2	4	E	SR 3.3.1.7 SR 3.3.1.11	≤ 6.3% RTP with time constant ≥ 2 sec	5% RTP with time constant ≥ 2 sec
4. Intermediate Range Neutron Flux	1(b), 2(c)	2	F,G	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ 41.9% RTP	25% RTP
	2(d)	2	H	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ 41.9% RTP	25% RTP

(continued)

(a) With Reactor Trip Breakers (RTBs) closed and Rod Control System capable of rod withdrawal.

(b) Below the P-10 (Power Range Neutron Flux) interlocks.

(c) Above the P-6 (Intermediate Range Neutron Flux) interlocks.

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 2 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
5. Source Range Neutron Flux	2(d)	2	I,J	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11	≤ 1.7 E5 cps	1.0 E5 cps
	3(a), 4(a), 5(a)	2	J,K	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.11	≤ 1.7 E5 cps	1.0 E5 cps
	3(e), 4(e), 5(e)	1	L	SR 3.3.1.1 SR 3.3.1.11	NA	NA
6. Overtemperature ΔT	1,2	4	E	SR 3.3.1.1 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.15	Refer to Note 1 (Page 3.3-20)	Refer to Note 1 (Page 3.3-20)
7. Overpower ΔT	1,2	4	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10 SR 3.3.1.15	Refer to Note 2 (Page 3.3-21)	Refer to Note 2 (Page 3.3-21)

(continued)

(a) With RTBs closed and Rod Control System capable of rod withdrawal.

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(e) With the RTBs open. In this condition, source range Function does not provide reactor trip but does provide input to the High Flux at Shutdown Alarm System (LCO 3.3.8) and indication.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 5 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
14. Turbine Trip						
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 SR 3.3.1.16	≥ 500 psig	580 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.14	≥ 90% open	96.7% open
15. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	Q	SR 3.3.1.13	NA	NA
16. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(d)	2	R	SR 3.3.1.11 SR 3.3.1.12	≥ 1.2E-5% RTP	2.0E-5% RTP
b. Low Power Reactor Trips Block, P-7	1	1 per train	S	SR 3.3.1.5	NA	NA
c. Power Range Neutron Flux, P-8	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 50.3% RTP	48% RTP
d. Power Range Neutron Flux, P-9	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 52.3% RTP	50% RTP
e. Power Range Neutron Flux, P-10 and input to P-7	1,2	4	R	SR 3.3.1.11 SR 3.3.1.12	(l,m)	(l,m)
f. Turbine Impulse Pressure, P-13	1	2	S	SR 3.3.1.10 SR 3.3.1.12	≤ 12.3% Impulse Pressure Equivalent turbine	10% Impulse Pressure Equivalent turbine

(continued)

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(j) Above the P-9 (Power Range Neutron Flux) interlock.

(l) For the P-10 input to P-7, the Allowable Value is ≤ 12.3% RTP and the Nominal Trip Setpoint is 10% RTP.

(m) For the Power Range Neutron Flux, P-10, the Allowable Value is ≥ 7.7% RTP and the Nominal Trip Setpoint is 10% RTP.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 5 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
14. Turbine Trip						
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 SR 3.3.1.16	≥ 500 psig	580 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.14	≥ 90% open	96.7% open
15. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	Q	SR 3.3.1.13	NA	NA
16. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(d)	2	R	SR 3.3.1.11 SR 3.3.1.12	≥ 1.2E-5% RTP	2.0E-5% RTP
b. Low Power Reactor Trips Block, P-7	1	1 per train	S	SR 3.3.1.5	NA	NA
c. Power Range Neutron Flux, P-8	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 50.3% RTP	48% RTP
d. Power Range Neutron Flux, P-9	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 52.3% RTP	50% RTP
e. Power Range Neutron Flux, P-10 and input to P-7	1,2	4	R	SR 3.3.1.11 SR 3.3.1.12	(l,m)	(l,m)
f. Turbine Impulse Pressure, P-13	1	2	S	SR 3.3.1.10 SR 3.3.1.12	≤ 12.3% Impulse Pressure Equivalent turbine	10% Impulse Pressure Equivalent turbine

(continued)

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(j) Above the P-9 (Power Range Neutron Flux) interlock.

(l) For the P-10 input to P-7, the Allowable Value is ≤ 12.3% RTP and the Nominal Trip Setpoint is 10% RTP.

(m) For the Power Range Neutron Flux, P-10, the Allowable Value is ≥ 7.7% RTP and the Nominal Trip Setpoint is 10% RTP.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

Table 3.3.1-1 (page 5 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT(n)
14. Turbine Trip						
a. Low Fluid Oil Pressure	1(j)	3	O	SR 3.3.1.10 SR 3.3.1.16	≥ 500 psig	580 psig
b. Turbine Stop Valve Closure	1(j)	4	P	SR 3.3.1.10 SR 3.3.1.14	≥ 90% open	96.7% open
15. Safety Injection (SI) Input from Engineered Safety Feature Actuation System (ESFAS)	1,2	2 trains	Q	SR 3.3.1.13	NA	NA
16. Reactor Trip System Interlocks						
a. Intermediate Range Neutron Flux, P-6	2(d)	2	R	SR 3.3.1.11 SR 3.3.1.12	≥ 1.2E-5% RTP	2.0E-5% RTP
b. Low Power Reactor Trips Block, P-7	1	1 per train	S	SR 3.3.1.5	NA	NA
c. Power Range Neutron Flux, P-8	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 50.3% RTP	48% RTP
d. Power Range Neutron Flux, P-9	1	4	S	SR 3.3.1.11 SR 3.3.1.12	≤ 52.3% RTP	50% RTP
e. Power Range Neutron Flux, P-10 and input to P-7	1,2	4	R	SR 3.3.1.11 SR 3.3.1.12	(l,m)	(l,m)
f. Turbine Impulse Pressure, P-13	1	2	S	SR 3.3.1.10 SR 3.3.1.12	≤ 12.3% Impulse Pressure Equivalent turbine	10% Impulse Pressure Equivalent turbine

(continued)

(d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.

(j) Above the P-9 (Power Range Neutron Flux) interlock.

(l) For the P-10 input to P-7, the Allowable Value is ≤ 12.3% RTP and the Nominal Trip Setpoint is 10% RTP.

(m) For the Power Range Neutron Flux, P-10, the Allowable Value is ≥ 7.7% RTP and the Nominal Trip Setpoint is 10% RTP.

(n) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

4. Intermediate Range Neutron Flux (continued)

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 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 NIS intermediate range indication is typically low off-scale in this MODE.

5. Source Range Neutron Flux

The LCO requirement for the Source Range Neutron Flux trip (NI-0031B, D, & E, NI-0032B, D, & G) Function ensures that protection is provided against an uncontrolled RCCA 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 NIS source range detectors are located external to the reactor vessel and measure neutrons leaking from the core. The NIS source range detectors do not provide any inputs to control systems. The source range trip is the only RTS automatic protection 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 two channels of Source Range Neutron Flux to be OPERABLE. Two OPERABLE channels are sufficient to ensure no single random failure will disable this trip Function. The LCO also requires two channels of the Source Range Neutron Flux to be OPERABLE in MODE 3, 4, or 5 with RTBs closed.

The Source Range Neutron Flux Function provides protection for control rod withdrawal from

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

5. Source Range Neutron Flux (continued)

subcritical, boron dilution (see LCO 3.3.8) and control rod ejection events. The Function also provides visual neutron flux indication in the control room.

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 Source Range Neutron Flux trip is blocked.

In MODE 3, 4, or 5 with the reactor shut down, the Source Range Neutron Flux trip Function must also be OPERABLE. If the Rod Control System 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 Rod Control System is not capable of rod withdrawal, the source range detectors are not required to trip the reactor. Source range detectors also function to monitor for high flux at shutdown. This function is addressed in Specification 3.3.8. Requirements for the source range detectors in MODE 6 are addressed in LCO 3.9.3.

6. Overtemperature ΔT

The Overtemperature ΔT trip Function (TDI-0411C, TDI-0421C, TDI-0431C, TDI-0441C, TDI-0411A, TDI-0421A, TDI-0431A, TDI-0441A) 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 pressure, coolant temperature, axial power distribution, and reactor power as indicated by loop ΔT 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 Function monitors both variation in power and flow since a decrease in flow

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY (continued)

16. Reactor Trip System Interlocks

Reactor protection interlocks are provided to ensure reactor trips are in the correct configuration for the current unit status. They back up operator actions to ensure protection system Functions are not bypassed during unit conditions under which the safety analysis assumes the Functions are not bypassed. 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 (NI-0035B, D, & E, NI-0036B, D, & G) is actuated when any NIS intermediate range channel goes approximately one decade above the minimum channel reading. If both channels drop below the setpoint, the permissive will automatically be defeated. The LCO requirement for the P-6 interlock ensures that the following Functions are performed:

- on increasing power, the P-6 interlock allows the manual block of the NIS 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.

- on decreasing power, the P-6 interlock automatically enables the NIS Source Range Neutron Flux reactor trip.

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

(continued)

BASES

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY

d. Power Range Neutron Flux, P-9 (continued)

reactor is not at a power level sufficient to have a load rejection beyond the capacity of the Steam Dump System.

e. Power Range Neutron Flux, P-10

The Power Range Neutron Flux, P-10 interlock (NI-0041B & C, NI-0042B & C, NI-0043B & C, NI-0044B & C) is actuated at approximately 10% power, as determined by two-out-of-four NIS power range detectors. If power level falls below 10% RTP on 3 of 4 channels, the nuclear instrument trips will be automatically unblocked. The LCO requirement for the P-10 interlock ensures that the following Functions are performed:

- on increasing power, the P-10 interlock allows the operator to manually block the Intermediate Range Neutron Flux reactor trip. Note that blocking the reactor trip also blocks the signal to prevent automatic and manual rod withdrawal;
- on increasing power, the P-10 interlock allows the operator to manually block the Power Range Neutron Flux — Low reactor trip;
- on increasing power, the P-10 interlock automatically provides a backup signal to block the Source Range Neutron Flux reactor trip;
- the P-10 interlock provides one of the two inputs to the P-7 interlock; and
- 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).

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.3.1.10

A CHANNEL CALIBRATION is performed every 18 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.

CHANNEL CALIBRATIONS 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 drift allowance used in the setpoint methodology.

The Frequency of 18 months is based on the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint methodology for some instrument functions, and the need to perform this Surveillance for some instrument functions under the conditions that apply during a plant outage and the potential for an unplanned plant transient if the Surveillance were performed at power. Operating experience has shown these components usually pass the Surveillance when performed on the 18 month Frequency.

SR 3.3.1.10 is modified by a Note stating that this test shall include verification that the time constants are adjusted to the prescribed values where applicable.

SR 3.3.1.11

SR 3.3.1.11 is the performance of a CHANNEL CALIBRATION, as described in SR 3.3.1.10, every 18 months. This SR is modified by a Note that states that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the power range neutron detectors includes a normalization of the detectors based on a power calorimetric and flux map performed above 75% RTP. The CHANNEL CALIBRATION for the source range neutron detectors includes obtaining the detector preamp discriminator curves and evaluating those curves.

(continued)

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.1.11 (continued)

The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown these components usually pass the Surveillance when performed on the 18 month Frequency.

SR 3.3.1.12

SR 3.3.1.12 is the performance of a COT of RTS interlocks every 18 months.

The Frequency is based on the known reliability of the interlocks and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

SR 3.3.1.13

SR 3.3.1.13 is the performance of a TADOT of the Manual Reactor Trip and the SI Input from ESFAS. This TADOT is as described in SR 3.3.1.4, except that the test is performed every 18 months.

The manual reactor trip TADOT shall independently verify the OPERABILITY of the undervoltage and shunt trip circuits for the manual reactor trip function. This test shall also verify the OPERABILITY of the Bypass breaker trip circuit(s), including the automatic undervoltage trip.

The Frequency is based on the known reliability of the Functions and the multichannel redundancy available, and has been shown to be acceptable through operating experience.

(continued)

B 3.3 INSTRUMENTATION

B 3.3.8 High Flux at Shutdown Alarm (HFASA)

BASES

BACKGROUND

The primary purpose of the HFASA is to warn the operator of an unplanned boron dilution event in sufficient time (15 minutes prior to loss of shutdown margin) to allow manual action to terminate the event. The HFASA is used for this purpose in MODES 3 and 4, and MODE 5 with the loops filled.

The HFASA consists of two channels of alarms, with each channel receiving input from one source range channel. An alarm setpoint of $\leq$ 2.3 times background provides at least 15 minutes from the time the HFASA occurs to the total loss of shutdown margin due to an unplanned dilution event. This meets the Standard Review Plan criteria for mitigating the consequences of an unplanned dilution event by relying on operator action.

APPLICABLE SAFETY ANALYSES

The analysis presented in Reference 1 identifies credible boron dilution initiators. Time intervals from the HFASA until loss of shutdown margin were calculated. The results demonstrate that sufficient time for operator response is available to terminate an inadvertent dilution event taking credit for one HFASA with a setpoint of $\leq$ 2.3 times background.

The HFASA satisfied Criterion 3 of the NRC Policy Statement.

LCO

The LCO requires two channels of HFASA to be OPERABLE with input from two source range channels to provide protection against single failure.

APPLICABILITY

The HFASA must be OPERABLE in MODES 3, 4, and 5.

The Applicability is modified by a Note which allows the HFASA to be blocked in MODE 3 during reactor startup so that spurious alarms are not generated.

(continued)

B 3.9 REFUELING OPERATIONS

B 3.9.3 Nuclear Instrumentation

BASES

BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors (NI-0031 and NI-0032) are part of the Nuclear Instrumentation System (NIS). These detectors are located external to the reactor vessel and detect neutrons leaking from the core. Temporary neutron flux detectors which provide equivalent indication may be utilized in place of installed instrumentation.

The installed source range neutron flux monitors are fission chamber detectors. The detectors monitor the neutron flux in counts per second. The instrument range covers seven decades of neutron flux (1E-1cps to 1E+6cps) with a 2% instrument accuracy. The detectors also provide continuous visual indication in the control room. The NIS is designed in accordance with the criteria presented in Reference 1.

APPLICABLE SAFETY ANALYSES

Two OPERABLE source range neutron flux monitors are required to provide a signal to alert the operator to unexpected changes in core reactivity such as an improperly loaded fuel assembly. The need for a safety analysis for an uncontrolled boron dilution accident is minimized by isolating all unborated water sources except as provided for by LCO 3.9.2, "Unborated Water Source Isolation Valves."

The source range neutron flux monitors satisfy Criterion 3 of the NRC Policy Statement.

LCO

This LCO requires that two source range neutron flux monitors be OPERABLE to ensure that redundant monitoring capability is available to detect changes in core reactivity. To be OPERABLE each monitor must provide visual indication.

(continued)

BASES

ACTIONS

B.2 (continued)

are OPERABLE. This stabilized condition is determined by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

The Completion Time of once per 12 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration and to ensure that unplanned changes in boron concentration would be identified. The 12 hour Completion Time is reasonable, considering the low probability of a change in core reactivity during this time period.

SURVEILLANCE REQUIREMENTS

SR 3.9.3.1

SR 3.9.3.1 is the performance of a CHANNEL CHECK, which is a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that the two indication channels should be consistent with core conditions. Changes in fuel loading and core geometry can result in significant differences between source range channels, but each channel should be consistent with its local conditions.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified similarly for the same instruments in LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation."

SR 3.9.3.2

SR 3.9.3.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range neutron flux monitors includes obtaining the detector preamp discriminator curves and evaluating those curves. The 18 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage. Operating experience has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

(continued)