



NUCLEAR ENERGY INSTITUTE

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BASED REGULATION

April 6, 2001

Dr. William D. Beckner, Branch Chief
Technical Specifications Branch
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Forwarding of TSTFs

PROJECT NUMBER: 689

Dear Dr. Beckner:

Enclosed are technical specification travelers TSTF-371, TSTF-372, and TSTF-373 for NRC review. Please note that TSTFs 372 and 373 have been assigned a "high" priority, and are listed on the "top ten items for CLIIP" list recently provided to NRC by industry. TSTF-371 has been assigned a medium priority.

Please contact me at (202) 739-8081 or Biff Bradley at (202) 739-8138 if you have any questions or desire further communication regarding these recommended changes.

Sincerely,

A handwritten signature in dark ink, appearing to read "Anthony R. Pietrangelo", is written over a light background.

Anthony R. Pietrangelo

Enclosure

c: Patricia Coates
Stewart L. Magruder, NRR/DRPM
Donald Hoffman, Excel
Technical Specification Task Force

Industry/TSTF Standard Technical Specification Change Traveler

Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support System

Classification: 1) Technical Change

Priority: **High**

NUREGs Affected: ☒ 1430 ☒ 1431 ☒ 1432 ☒ 1433 ☒ 1434

Description:

A new use and application rule is added to the ISTS which allows certain support systems which do not have LCOs to be incapable of performing their required support function without declaring the supported Technical Specification systems inoperable for a period of time. These non-Technical Specification support systems were in many plant Technical Specifications before ISTS conversion. This delay time is provided to allow required maintenance, testing, or repair as was allowed in the pre-conversion TS. The systems are:

Snubbers

[Containment] Structural Integrity

Containment Penetration Conductor Overcurrent Protective Devices

Motor Thermal Overload Devices

Area Temperature Monitoring

Justification:

See attached justification.

Industry Contact:	Wideman, Steve	(316) 364-4037	stwidem@wcnoc.com
NRC Contact:	Gilles, Nan	301-415-1180	nvg@nrc.gov

Revision History

OG Revision 0

Revision Status: Active

Next Action: TSTF

Revision Proposed by: WOG

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 21-Jul-00

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 08-Nov-00

TSTF Review Information

TSTF Received Date: 08-Nov-00 Date Distributed for Review: 08-Nov-00

OG Review Completed: ☐ BWO ☐ WOG ☐ CEOG ☐ BWROG

TSTF Comments:
(No Comments)

TSTF Resolution: Approved Date: 18-Jan-01

Incorporation Into the NUREGs

4/4/2001

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

LCO 3.0	LCO and SR Applicability
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LCO 3.0.2	LCO and SR Applicability
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LCO 3.0.8	LCO and SR Applicability
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	Change Description: Adds LCO 3.0.8
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LCO 3.0.8 Bases	LCO and SR Applicability
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	Change Description: Adds LCO 3.0.8

4/4/2001

Background

As part of a plant's conversion to the Improved Standard Technical Specifications (ISTS) or implementation of an amendment prior to conversion, the former TS requirements for snubbers and many other support systems were relocated to a licensee controlled document such as the Technical Requirements Manual (TRM) or a program document. The conversion submittal or split report amendment application identified the old TS requirements as candidates for relocation based on the fact that the TS requirements did not meet any of the four criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in the ITS. The removal of these requirements from the TS was classified as a relocation as opposed to a more restrictive or less restrictive change, and the NRC approved the relocation without placing any restriction on the use of the relocated requirements. Therefore, as is current practice, it was intended that when a non-Technical Specifications support system could not perform the required safety function(s) for a system that is required to be OPERABLE by the TS, the licensee controlled document requirements for the support system would be invoked before the system TS LCO would become applicable. For example, if a snubber was determined to not meet the licensee controlled documents requirements, it needed to be either restored or replaced with a known working snubber within 72 hours, and an engineering evaluation would also need to be performed for the attached component within that same 72 hour period. If these actions are not completed within the allocated time, the system supported by the snubber would be declared inoperable and the Conditions and Required Actions for that system followed.

Need For Change

In a July 9, 1999 letter from the NRC to Duke Power, the NRC agreed with the below position:

LCO 3.0.6 only applies to those support systems which have their on TS. For support systems which are not in TS, when a supported system is made inoperable due to a non-TS support system being inoperable, the TS conditions and required actions for the supported system are required to be immediately entered.

The NRC Technical Specification Branch has taken the position that licensees are bound by Technical Specification LCOs 3.0.2 and 3.0.6 which require them to immediately enter the supported system Conditions and Required Actions when a snubber is removed for testing. In other words, once the snubber LCO is removed from the Technical Specifications, there is no exception from the Technical Specification requirements for snubbers and if a snubber is removed for testing (i.e., a snubber is declared inoperable for removal for testing), the supported system Condition and Required Actions must be entered immediately. The only exception is if the supported system has been analyzed and determined to be OPERABLE without the snubber.

At the Winter 2000 Snubber Users Group (SNUG) meeting Dr. Arnold Lee presented the above position. At the meeting, it was stated that if a licensee has implemented the

Improved Standard Technical Specifications and relocated the Snubber specification from the Technical Specifications, the 72 hour snubber Required Action and Completion Time in the TRM could not be utilized prior to entering the supported system TS Condition and Required Actions when testing snubbers.

At the June 13-14, 2000, TSTF/NRC meeting, Dr. Bill Beckner, Chief of the NRC Technical Specifications Branch, indicated that there was sufficient precedent to support a position that the 72 hour Completion Time can be considered a delay time. The NRC Technical Specification branch has stated that not having the 72 hour window to perform testing is an unintended burden that resulted from implementing the Improved Technical Specifications. An example of this precedence is in the NRC memorandum dated May 27, 1986, "Technical Specification Interpretation on Snubbers," which specifically stated that, "It should be recognized that the snubber TS are unique in that the operability requirements do not require consideration of associated system redundancy or impact until a snubber is out of service in excess of 72 hours." At that meeting, the NRC indicated that their preference for a resolution to the issue was some type of change to the Section 3.0 requirements.

The intent of this proposal is to preserve this precedent and extend it to the other non-Technical Specification support systems or components (thermal overload devices, penetration conductor overcurrent protection, etc.) for which similar allowances have been assumed to apply, but are now in question.

Proposed Change

The proposed change will add a new LCO to the Section 3.0, LCO and SR Applicability, section of the ISTS. This new LCO, LCO 3.0.8, states:

When a Technical Specification LCO is not met solely due to a non-Technical Specification support system, listed below, being unable to perform its related support function, the Technical Specification LCO is considered to be met unless the associated delay time of the non-Technical Specification support system has expired. This is an exception to LCO 3.0.2 for the Technical Specification supported system. Upon expiration of the non-Technical Specification support system delay time, the Technical Specification supported system shall be declared inoperable and the applicable Conditions and Required Actions for the Technical Specification supported system shall be entered in accordance with LCO 3.0.2.

<u>Non-Technical Specification Support System</u>	<u>Delay Time</u>
Snubbers	[72] hours
[Containment] Structural Integrity - Average group tendon prestressing force less than minimum required	[72] hours
[Containment] Structural Integrity – Abnormal degradation other than above	[15] days
Containment Penetration Conductor Overcurrent Protective Devices	[72] hours
Motor Thermal Overload Devices	[72] hours
Area Temperature Monitoring	[72] hours]

Proposed TS Bases for the proposed LCO 3.0.8 states:

LCO 3.0.8 establishes an exception to LCO 3.0.2 for support systems that do not have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inability of the non-TS support system to perform its required safety function(s). This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system requirements, which are located outside of the TS under licensee control. These requirements are located outside of the TS because they have been determined to not meet the criteria for retention in the TS located in 10 CFR 50.36(c)(2)(ii), and, as such, have been determined to be appropriate for control by the licensee.

When one of the non-TS support systems listed in LCO 3.0.8 is not capable of providing the required safety function(s) required for OPERABILITY of a supported TS system, a delay time is provided to allow required maintenance, testing, and/or repair. Licensee-controlled documents may also require other compensatory actions to be taken during the delay time. During this delay time, the supported TS system is not considered inoperable and the Conditions and Required Actions of the supported system do not have to be entered. If the delay time for the non-TS system expires without the support system being restored to a condition in which it can perform the required safety function(s) required for supported system OPERABILITY, the TS supported system must be declared inoperable and its Conditions and Required Actions followed in accordance with LCO 3.0.2.

Justification

The purpose of this change is to provide the same level of operational safety and flexibility provided by the listed systems in the proposed LCO 3.0.8 as was provided prior to conversion to ITS. Prior to conversion to the ITS, the systems listed in the proposed LCO 3.0.8 were located in the TS. If one of those systems was inoperable, its Actions were taken. Under the pre-ITS conventions and rules, the supported system was not considered inoperable while the support system Actions were being taken. Only when the support system Action Times were expired (or if directed by the support system Actions) was the supported system considered inoperable and its Actions taken.

The systems listed in the proposed LCO 3.0.8 did not meet the criteria for retention in the TS after ITS conversion and were relocated to a licensee controlled document, such as a Technical Requirements Manual (TRM) or a program document. This relocation did not alter the requirements on those systems, but allowed those requirements to be changed under the auspices of 10 CFR 50.59. An unintended consequence of that relocation is to require, under ITS LCO 3.0.2, the supported systems remaining in TS to be immediately declared inoperable and their Conditions and Required Actions taken when one of the relocated TS systems is not capable of performing its required safety function(s).

This change in operation is not justified by any decrease in plant safety related to the relocation of the requirements but is strictly an administrative consequence of the relocation. The plant design has not changed. The operational actions taken when one of the listed systems does not meet its requirements did not change as a consequence of the relocation. The support systems described in the licensee controlled document continue to perform the function assumed in the safety analysis and the same actions continue to be taken if those support systems cannot perform that function. However, under the ITS, the supported system must be declared inoperable and its Conditions and Required Actions followed, even to the point of a plant shutdown, even though there has been no change in the design or operation of the plant. This decreases plant safety and operational flexibility.

The proposed LCO 3.0.8 corrects this unintended consequence and restores the level of plant safety afforded by the non-TS support systems prior to their relocation.

Effect on Safety Analysis

The plant safety analyses assume that the required safety systems are OPERABLE, except for a single failure. The accident analyses do not consider the effect of an accident occurring while relying on Conditions and Required Actions. The purpose of TS Completion Times is to minimize the length of time that equipment can be out of service should an accident occur. As a result, this change has no effect on the safety analyses. The inoperability of TS supported systems will continue to be limited by the delay time associated with non-TS supporting systems and the Conditions and Required Actions of the supported system. These delay times were considered to be consistent with the safety analysis assumptions prior to relocation from the subject TS to the TRM and continue to be consistent with the safety analysis.

Determination of No Significant Hazards Considerations

A change is proposed to the Improved Technical Specifications to allow a delay time for certain support systems not governed by the Technical Specifications (TS) which cannot perform their required support function(s) before the supported systems are declared inoperable. This is an exception to LCO 3.0.2.

In accordance with the criteria set forth in 10 CFR 50.92, the Industry has evaluated these proposed Improved Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change allows a delay time before declaring supported TS systems inoperable when certain non-TS supporting systems cannot perform their required safety function(s). Entrance into Actions is not an initiator of any accident previously evaluated.

Consequently, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on the delay time allowed before declaring a TS supported system inoperable and taking its Conditions and Required Actions are no different than the consequences of an accident under the same plant conditions while relying on the existing TS supported system Conditions and Required Actions. Therefore, the consequences of an accident previously evaluated are not significantly increased by this change. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change allows a delay time before declaring supported TS systems inoperable when certain non-TS supporting systems cannot perform their required safety function(s). The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The proposed change allows a delay time before declaring supported TS systems inoperable when certain non-TS supporting systems cannot perform their required safety function(s). The proposed change restores an allowance in the pre-ISTS conversion TS which was unintentionally eliminated by the conversion. The pre-ISTS TS were considered to provide an adequate margin of safety for plant operation, as does the post-ISTS conversion TS. Therefore, the margin of safety is not significantly reduced by the proposed change. Therefore, this change does not involve a significant reduction in a margin of safety.

INSERT 1

LCO 3.0.8 When a Technical Specification LCO is not met solely due to a non-Technical Specification support system, listed below, being unable to perform its related support function, the Technical Specification LCO is considered to be met unless the associated delay time of the non-Technical Specification support system has expired. This is an exception to LCO 3.0.2 for the Technical Specification supported system. Upon expiration of the non-Technical Specification support system delay time, the Technical Specification supported system shall be declared inoperable and the applicable Conditions and Required Actions for the Technical Specification supported system shall be entered in accordance with LCO 3.0.2.

<u>Non-Technical Specification Support System</u>	<u>Delay Time</u>
Snubbers	[72] hours
[Containment] Structural Integrity Average group tendon prestressing force less than minimum required	[72] hours
[Containment] Structural Integrity – Abnormal degradation other than above	[15] days
Containment Penetration Conductor Overcurrent Protective Devices	[72] hours
Motor Thermal Overload Devices	[72] hours
Area Temperature Monitoring	[72] hours]

INSERT 2

LCO 3.0.8 LCO 3.0.8 establishes an exception to LCO 3.0.2 for support systems that do not have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inability of the non-TS support system to perform its required safety function(s). This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system requirements, which are located outside of the TS under licensee control. These requirements are located outside of the TS because they have been determined to not meet the criteria for retention in the TS located in 10 CFR 50.36(c)(2)(ii), and, as such, have been determined to be appropriate for control by the licensee.

When one of the non-TS support systems listed in LCO 3.0.8 is not capable of providing the required safety function(s) required for OPERABILITY of a supported TS system, a delay time is provided to allow required maintenance, testing, and/or repair. Licensee-controlled documents may also require other compensatory actions to be taken during the delay time. During this delay time, the supported TS system is not considered inoperable and the Conditions and Required Actions of the supported system do not have to be entered. If the delay time for the non-TS system expires without the support system being restored to a condition in which it can perform the required safety function(s) required for supported system OPERABILITY, the TS supported system must be declared inoperable and its Conditions and Required Actions followed in accordance with LCO 3.0.2.

TSTF-372

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5, ~~and~~ LCO 3.0.6. and LCO 3.0.8

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

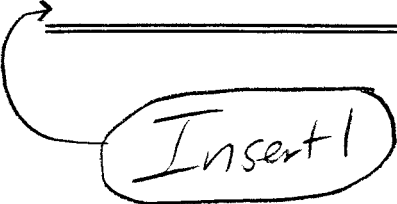
TSTF-372

3.0 LCO APPLICABILITY (continued)

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.15, "Safety Function Determination Program." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Test Exception LCOs [3.1.9, 3.1.10, 3.1.11 and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.



Insert 1

TSTF-372

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs LCO 3.0.1 through LCO 3.0.3 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

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TS/F-372

BASES

LCO 3.0.6
(continued) Required Actions of the LCO in which the loss of safety function exists are required to be entered.

LCO 3.0.7 There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs [3.1.9, 3.1.10, 3.1.11, and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

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TSTF-372

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6 and LCO 3.0.8.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

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TSTF-372

3.0 LCO APPLICABILITY (continued)

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Test Exception LCOs [3.1.9, 3.1.10, 3.1.11, and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.



Insert 1

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY *TSTF-372*

BASES

LCOs LCO 3.0.1 through LCO 3.0.6 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

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TSTF-372

BASES

LCO 3.0.6
(continued)

system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs [3.1.9, 3.1.10, 3.1.11, and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.



Insert 2

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TSTF-372

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5, ~~and~~ LCO 3.0.6. and LCO 3.0.8

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. [MODE 4 within 13 hours]; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

TSTF-372

3.0 LCO APPLICABILITY (continued)

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Special test exception (STE) LCOs [in each applicable LCO section] allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

Insert 1

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TSTF-372

BASES

LCOs	LCO 3.0.1 through LCO 3.0.2 establish the general requirements applicable to all Specifications and apply at all times unless otherwise stated.
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LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
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LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ul style="list-style-type: none">a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; andb. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering</p>
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(continued)

TSTF-372

BASES

SR 3.0.7
(continued)

these requirements must be met concurrently with the requirements of the STE LCO.

Unless the SRs of the specified normal LCOs are suspended or changed by the special test, those SRs that are necessary to meet the specified normal LCOs must be met prior to performing the special test. During the conduct of the special test, those Surveillances need not be performed unless specified by the ACTIONS or SRs of the STE LCO.

ACTIONS for STE LCOs provide appropriate remedial measures upon failure to meet the STE LCO. Upon failure to meet these ACTIONS, suspend the performance of the special test and enter the ACTIONS for all LCOs that are then not met. Entry into LCO 3.0.3 may possibly be required, but this determination should not be made by considering only the failure to meet the ACTIONS of the STE LCO.



Insert 2

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TSTF-372

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5, ~~and~~ LCO 3.0.6. and LCO 3.0.8

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

TSTF-372

3.0 LCO APPLICABILITY (continued)

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.12, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.



Insert 1

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TSTF-372

BASES

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| LCOs | LCO 3.0.1 through LCO 3.0.⑦ establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated. |
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| LCO 3.0.1 | LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification). |
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| LCO 3.0.2 | <p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ul style="list-style-type: none">a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; andb. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering</p> |
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(continued)

BASES

TSTF-372

LCO 3.0.6
(continued)

the LCO in which the loss of safety function exists are required to be entered.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO ACTIONS may direct the other LCOs' ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

Insert 2

TSTF-372

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5, ~~and~~ LCO 3.0.6. *and LCO 3.0.8*

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

TSTF-372

3.0 LCO APPLICABILITY (continued)

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.12, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain LCO 3.0.7 unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.



Insert 1

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

TSTF-372

BASES

LCOs LCO 3.0.1 through LCO 3.0.6 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

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TSTF-372

BASES

LCO 3.0.7
(continued)

the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.



Insert 2