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1CAN030204

March 13, 2002

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Arkansas Nuclear One, Unit 1
Docket No. 50-313
License Amendment Request
Application for Technical Specification Change Regarding Missed
Surveillances Using the Consolidated Line Item Improvement Process

REFERENCES: TSTF-358, Revision 5 as fully modified by Federal Register Notice
66FR32400, dated June 14, 2001

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following Technical Specification (TS) amendment for Arkansas Nuclear One, Unit 1 (ANO-1). The proposed amendment would modify TS requirements for missed surveillances in SR 3.0.3.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked up to show the proposed change. Attachment 6 provides revised (clean) TS Bases pages.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Arkansas State Official.

The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that these changes involve no significant hazards considerations. The bases for these determinations are included in the attached submittal.

The proposed changes include a commitment to incorporate the bases information for SR 3.0.3 as denoted in the fully modified Technical Specification Task Force TSTF-358, Revision 5.

Entergy has recently converted the ANO-1 TSs to the Improved TSs (ITS) of NUREG 1430, Revision 1 and plans to implement the new TSs on July 8, 2002. Entergy, therefore, requests approval of the proposed License Amendment by June 1, 2002, with the amendment being implemented in conjunction with the implementation of the ANO-1 ITS.

If you have any questions or require additional information, please contact David Bice at 479-858-5338.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 13, 2002.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig", with a stylized flourish extending from the end.

CGA/dbb

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (mark-up)
3. Revised Technical Specification Pages
4. Regulatory Commitments
5. Proposed Technical Specification Bases Changes (mark-up)
6. Revised Technical Specification Bases Pages

cc: Mr. Ellis W. Merschoff
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U. S. Nuclear Regulatory Commission
Attn: Mr. William Reckley MS O-7 D1
Washington, DC 20555-0001

Mr. Bernard R. Bevill
Director Division of Radiation
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4815 West Markham Street
Little Rock, AR 72205

Attachment 1

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Description and Assessment

1.0 DESCRIPTION

This letter is a request to amend Operating License DPR-51 for Arkansas Nuclear One, Unit 1 (ANO-1).

The proposed amendment would modify Technical Specifications (TS) requirements for missed surveillances in Surveillance Requirement (SR) 3.0.3. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard TS (STS) change TSTF-358 Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001, and in response to public comments. The availability of this TS improvement was published in the Federal Register on September 28, 2001 as part of the consolidated line item improvement process (CLIIP).

In addition, one typographical error and minor formatting error in the affected Bases section is corrected (illustrated in Attachment 5). Since this is purely administrative in nature, no further discussion of this change is included within this submittal.

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy has reviewed the safety evaluation dated June 8, 2001 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to ANO-1 and justify this amendment for the incorporation of the changes to the ANO-1 TS.

2.2 Optional Changes and Variations

Entergy is not proposing any variations or deviations from the TS changes described in the fully modified TSTF-358 Revision 5 or the NRC staff's model safety evaluation dated June 8, 2001.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Entergy has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. Entergy has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to ANO-1 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on September 28, 2001 for this TS improvement, plant-specific verifications were performed as follows:

Entergy has established TS Bases for SR 3.0.3 which state that use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The modification will also include changes to the Bases for SR 3.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals, but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that Entergy is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. Furthermore, the Bases state that all missed surveillances will be placed in the licensees Corrective Action Program. Finally, Entergy has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL CONSIDERATIONS

Entergy has reviewed the environmental evaluation included in the model safety evaluation dated June 8, 2001 as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to ANO-1 and the evaluation is hereby incorporated by reference for this application.

Attachment 2

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Proposed Technical Specification Changes (mark-up)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1	<p>SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.</p>
SR 3.0.2	<p>The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.</p> <p>For Frequencies specified as "once," the above interval extension does not apply.</p> <p>If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.</p> <p>Exceptions to this Specification are stated in the individual Specifications.</p>
SR 3.0.3	<p>If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is lessgreater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.</p> <p>If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p> <p>When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p>

Attachment 3

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Revised Technical Specification Pages

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1	<p>SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.</p>
SR 3.0.2	<p>The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.</p> <p>For Frequencies specified as "once," the above interval extension does not apply.</p> <p>If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.</p> <p>Exceptions to this Specification are stated in the individual Specifications.</p>
SR 3.0.3	<p>If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.</p> <p>If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p> <p>When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.</p>

Attachment 4

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Regulatory Commitments

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to David Bice at 479-858-5338

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
Entergy will establish the Technical Specification Bases for SR 3.0.3 as adopted with the applicable license amendment.	X		Implemented with Amendment

Attachment 5

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Proposed Technical Specification Bases Changes (mark-up)

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SR APPLICABILITY (continued)

SR 3.0.2 (continued)

These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is the Reactor Building Leakage Rate Testing Program.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, ~~or~~ operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved

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exemptions, etc.) is discovered to not to have been performed when specified, SR 3.0.3 allows the full delay

SR APPLICABILITY (continued)

SR 3.0.3 period of up to the specified Frequency 24 hours to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

(continued) SR 3.0.3 also provides a time limit for, and allowances for the performance completion of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and

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the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Satisfactory completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified

SR APPLICABILITY (continued)

SR 3.0.4 (continued)

conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a

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Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability associated with operation in MODES 1, 2, 3 or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Attachment 6

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Revised Technical Specification Bases Pages

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SR APPLICABILITY (continued)

SR 3.0.2 (continued)

These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is the Reactor Building Leakage Rate Testing Program.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows the full delay period of up to the specified

SR APPLICABILITY (continued)

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SR 3.0.3
(continued)

Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

SR APPLICABILITY (continued)

SR 3.0.3

Satisfactory completion of the Surveillance within the delay period

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(continued)	allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.
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SR 3.0.4	SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.
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This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency

SR APPLICABILITY (continued)

SR 3.0.4	specified such that it is not "due" until the specific conditions needed are
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(continued)

met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability associated with operation in MODES 1, 2, 3 or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.
