

September 16, 2011

TSTF-11-12
PROJ0753

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

SUBJECT: Transmittal of TSTF-530, Revision 0, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09"

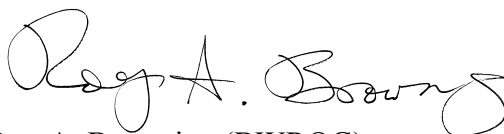
Enclosed for NRC review is Revision 0 of TSTF-530, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09." TSTF-530 is applicable to all plant types.

The TSTF requests that the NRC bill the Boiling Water Reactor Owners' Group and the Pressurized Water Reactor Owners Group for the review of this Traveler.

Should you have any questions, please do not hesitate to contact us.



Norman J. Stringfellow (PWROG/W)



Roy A. Browning (BWROG)



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Wendy E. Croft (PWROG/B&W)

Enclosure

cc: Robert Elliott, Technical Specifications Branch, NRC
Michelle Honcharik, Licensing Processes Branch, NRC

Technical Specifications Task Force Improved Standard Technical Specifications Change Traveler

Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09

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

Classification 1) Technical Change

Recommended for CLIP?: Yes

Correction or Improvement: Correction

NRC Fee Status: Not Exempt

Benefit: Reduces Testing

See attached.

Revision History

OG Revision 0

Revision Status: Active

Revision Proposed by: TSTF

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 14-Jul-11

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 12-Aug-11

TSTF Review Information

TSTF Received Date: 12-Aug-11

Date Distributed for Review 12-Aug-11

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

TSTF Comments:
(No Comments)

TSTF Resolution: Approved

Date: 16-Sep-11

NRC Review Information

NRC Received Date: 16-Sep-11

Affected Technical Specifications

SR 3.0.3

SR Applicability

16-Sep-11

SR 3.0.3 Bases

SR Applicability

16-Sep-11

1. SUMMARY DESCRIPTION

The proposed change revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered.

Improved Standard Technical Specifications (ISTS) SR 3.0.3, "SR Applicability," states:

"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.

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.

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."

The use of the past tense in the first paragraph (i.e., "If it is discovered that a Surveillance was not performed...") has lead some licensees to interpret SR 3.0.3 to mean that it can only be used if it is discovered after the specified Frequency has expired that a SR was not performed. This represents the majority of the cases in which SR 3.0.3 is applied.

However, SR 3.0.3 is also applicable if it is discovered that a SR has not been performed prior to the expiration of the specified Frequency, but there is insufficient time, incorrect plant conditions, or a lack of required test equipment to perform the SR within the specified Frequency. In general, the SR 3.0.2 definition of "specified Frequency", which provides 1.25 times the interval specified in the Frequency, is sufficient to address such situations. However, that is not always the case and the provisions of SR 3.0.3 should be available.

The proposed change to SR 3.0.3 is consistent with the Technical Specifications (TS) proposed in Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of Standard Tech Specs on Limiting Conditions for Operation and Surveillance Requirements," dated June 14, 1987. The provision was reworded when incorporated into the Improved Standard Technical Specifications (ISTS) and the requirement was unintentionally confused.

The proposed change revises SR 3.0.3 to clarify its application. In addition, the corresponding TS Bases are revised reflect the changes to the TS.

Attachment 1 contains the proposed model application for plant-specific adoption of TSTF-530.

2. DETAILED DESCRIPTION

Surveillance Requirement 3.0.3 originated in a Nuclear Regulatory Commission(NRC) proposal published in GL 87-09. The GL stated purpose for the allowance (then called Specification 4.0.3) was:

"The second problem involves unnecessary shutdowns caused by Specification 4.0.3 when surveillance intervals are inadvertently exceeded. The solution is to clarify the applicability of the Action Requirements, to specify a specific acceptable time limit for completing a missed surveillance in certain circumstances, and to clarify when a missed surveillance constitutes a violation of the Operability Requirements of an LCO."

The GL proposed language for Specification 4.0.3 states:

"Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours."

In the ISTS, the requirements in Specification 4.0.3 were revised. In ISTS Revision 0, SR 3.0.3 stated:

"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 less. This delay period is permitted to allow performance of the Surveillance.

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. The Completion Times of the Required Actions begin immediately upon expiration of the delay period."

Note that the ISTS changed the wording from the act ("Failure to perform a Surveillance Requirement...") to its discovery ("If it is discovered that a Surveillance was not performed...") and introduced the past tense wording. This wording change is viewed by licensees as restricting the use of SR 3.0.3 to those conditions in which it is determined after the expiration of the specified Frequency that the Surveillance has not been performed. That restriction did not appear in the language proposed in the GL. In the GL language, the Specification 4.0.3 allowance could be applied when it was determined that the Surveillance could not be performed prior to expiration of the specified Frequency. The Actions would apply once the specified Frequency has expired. The ISTS wording imposes was an unintended and unnecessary restriction.

It is possible to discover that a Surveillance cannot be performed prior to expiration of the specified Frequency but without sufficient time to perform the SR within the specified Frequency (which includes the 1.25 allowance of SR 3.0.2). Examples include:

- Discovering a Surveillance is due with insufficient time remaining to perform the Surveillance,
- Discovering a Surveillance is due and the operational conditions prohibit the performance of the Surveillance; or
- Testing equipment failures that prevent the performance of the Surveillance and which cannot be corrected within the specified Frequency.

The proposed change would revise the first paragraph of SR 3.0.3 to state (Text in italics is added, struck-through text is removed.):

"From the time it is discovered that a Surveillance has not been performed ~~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."

The TS Bases of SR 3.0.3 are revised to add the following:

"There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and
- b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery."

The Bases are also revised to address other inconsistencies:

- References to "completing" a SR are replaced with "performing" or "performing and meeting" the SR to be consistent with the ISTS terminology;
- References to "missing" a SR are replaced with "not performing" the SR;

3. Technical Evaluation

The proposed change will not result in a significant increase in the use of SR 3.0.3. In the vast majority of cases, licensees perform Surveillances within the specified Frequency. If it is determined that a Surveillance will not be performed as scheduled due to a scheduling oversight, adverse operating conditions, or test equipment failure, the 1.25 Frequency allowance of SR 3.0.2 may be utilized to perform the Surveillance. The proposed change would only allow the application of SR 3.0.3 in the rare circumstance in which it is determined that it will not be possible to perform a Surveillance within the specified Frequency.

SR 3.0.3 is an exception to performing a Surveillance; it does not allow a Surveillance to not be met. If a licensee does not have reasonable assurance that the Surveillance will be met when it is performed, SR 3.0.3 is not applicable.

The existing SR 3.0.3 requirement to enter into the corrective action process all Surveillances not performed within the specified Frequency is unchanged. A significant increase in the number of missed surveillances could trigger a review by NRC of the licensee's actions and performance.

Continued Applicability of TSTF-358, "Missed Surveillance Requirements"

TSTF-358, approved by the NRC on October 3, 2001, modified SR 3.0.3 to allow a delay period of 24 hours or up to the Surveillance Frequency interval, whichever is longer. A risk evaluation is performed for any Surveillance delayed greater than 24 hours. The Traveler required that failure to meet a Surveillance Frequency be documented in the licensee's 10 CFR 50, Appendix B, Corrective Action Program, and be available for NRC review. TSTF-358 has been adopted by all but one licensee.

The justification given for SR 3.0.3 in GL 87-09 is not changed by the risk-informed delay time relaxation beyond 24 hours granted in TSTF-358. The GL states:

- "It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of required surveillance. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance."
- "The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is

a shutdown to comply with Action Requirements before the surveillance can be completed."

From a risk-assessment perspective, when the Surveillance is discovered to not be performed within the specified Frequency makes no difference in the analysis or risk result. TSTF-358 requires evaluating the risk from the expiration of the previous specified Frequency. Stated another way, there is no difference in the risk of a Surveillance not performed within its Frequency if it is discovered 1 minute after the expiration of the Frequency or 1 minute before the expiration. However, under the current understanding of SR 3.0.3, the former allows up to the limit of the specified Frequency to perform the SR and the later requires declaring the SR not met and following the Actions. This difference has no safety benefit and could lead to a plant transient (e.g., a plant shutdown) or the licensee requesting emergency regulatory relief, such as a Notice of Enforcement Discretion or emergency or exigent license amendment.

The justification for TSTF-358 evaluated the effect on the Safety Analysis and the effect on the Risk Informed Analysis. It states:

"Effect on Safety Analyses

The accident analyses presented in the UFSAR do not address the performance of Surveillance Requirements. The accident analyses assume that the necessary equipment is available and then, in most cases, assumes the single most limiting active failure occurs. Therefore, this proposal to extend the time allowed to perform a missed Surveillance would not affect the accident analyses, as long as the equipment was, in fact, OPERABLE.

Effect on Risk Informed Analysis

Plant specific Probabilistic Safety Assessments (PSAs) consider the time between Surveillances as the longest period that a particular component may be inoperable without detection. This time period may be used in determining the component basic event (BE) failure probabilities for standby components. To evaluate the potential impact of a missed Surveillance on plant risk, the component failure probability can be increased proportionally to the time interval from the last test to the next expected test of the component. This new component failure probability can then be factored into the PRA model and the impact on [Core Damage Frequency (CDF) and/or Large Early Release Frequency (LERF)] can be determined.

It is expected that missed Surveillances on only a few standby components could result in a significant impact on plant risk as measured by CDF and LERF. In one example, doubling component failure probabilities, assuming the Surveillance test interval doubled, results in only a few plant components providing a significant impact on risk. The vast majority of the components have little or no impact on risk. Those components that have a significant impact are located outside containment and can normally be easily tested within a short time if a Surveillance is missed, such as, auxiliary feedwater pumps, high pressure safety injection pumps, and emergency diesel generators.

Additionally, the number of missed Surveillances is a very small fraction of the total number of Surveillances performed at a nuclear power plant in a year. When this is combined with the very rare occurrence of the missed Surveillance determining that the equipment being tested is inoperable, the increase in risk to the plant is very small.

For those Surveillances that are potentially risk-significant, the requirement to perform a risk evaluation if it is extended beyond 24 hours will ensure the risk remains acceptable. So even though the historical data and typical PSA results show an overall small risk increase for this change, the risk evaluation requirements will ensure that the risk increase for a given Surveillance extension is also acceptable.

Performance of some Surveillances require the associated component to be made temporarily inoperable (due to required system configuration, etc.) while other Surveillances require specific plant configurations. Having equipment not available or having to manipulate the plant configuration carries with it a finite risk. This may include equipment down time, misconfiguration, equipment wear, radiation exposure, burden on plant personnel, and the potential for plant transients (Reference 1). Additionally, if the plant is required to shut down in order to complete the Surveillance, the transition from full power to shutdown provides a risk increase. Overall, due to the avoidance of unnecessary shutdowns, the low number of potentially risk-significant Surveillances, and the requirements for a risk evaluation if a Surveillance is extended, the change is considered a risk reduction to risk neutral. Additionally, the change represents a burden reduction for both the plant and the NRC."

There is nothing in the justification for TSTF-358 that requires the discovery that a Surveillance is not performed within its specified Frequency after the specified Frequency is expired. The actions to be taken and the risk calculation to be performed are unaffected.

The NRC model Safety Evaluation for TSTF-358 (66 FR 32401) was also examined. The model Safety Evaluation concludes that the proposed change is acceptable because:

- A risk evaluation shall be performed for any surveillance delayed longer than 24 hours, and the risk impact shall be managed.
- The missed surveillance test should be performed at "the first reasonable opportunity." The "first reasonable opportunity" will be determined by taking into consideration the risk impact from delaying the surveillance test as well as the impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the surveillance.
- A missed surveillance will be treated as an "emergent" condition in the same fashion as other unplanned maintenance activities. The risk impact of the condition will be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance (NRC Regulatory Guide 1.182).

Rescheduling of missed surveillances pursuant to Regulatory Guide 1.182 will ensure the necessary provisions for managing the risk impact of performing the surveillance in conjunction with other ongoing plant configuration changes.

- The NRC's operating reactor oversight process will provide the framework for inspectors and other staff to review missed surveillances and assess the licensee's actions and performance. Inspection procedures are in place which will allow NRC staff to oversee the implementation of Maintenance Rule requirements, including the adequacy of pre-maintenance risk assessments performed by licensees.
- A missed surveillance will be placed in the licensee's corrective action program, thus providing the staff with a means to verify that the number of missed surveillances continues to be very low.
- The number of missed surveillance tests is a very small fraction of the total number of such tests performed at a nuclear plant each year. The proposed change is not intended to be used as an operational convenience to extend surveillance frequencies.

There is nothing in the model Safety Evaluation for TSTF-358 that is affected by the proposed change.

In conclusion, the proposed change revises SR 3.0.3 to be consistent with the original requirements as described in GL 87-09 and is consistent with the risk informed provision added by TSTF-358. The proposed change will not result in a significant increase in the use of SR 3.0.3 while avoiding unwarranted plant transients or emergency regulatory relief.

4 Regulatory Evaluation

4.1 Applicable Regulatory Requirements / Criteria

Title 10 of the Code of Federal Regulations, Paragraph 50.36, requires Technical Specifications and describes the Limiting Conditions for Operation (LCOs) and Surveillances. The proposed changes clarify the implementation of the Technical Specifications and Surveillances required by 10 CFR 50.36.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

4.2 No Significant Hazards Consideration

The Technical Specifications Task Force (TSTF) has evaluated whether or not a significant hazards consideration is involved with the proposed generic change by

focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The performance of Surveillances is not an initiator to any accident previously evaluated. The provisions of SR 3.0.3 may only be used when there is reasonable assurance the Surveillance will meet the acceptance criteria when performed. The vast majority of Surveillances demonstrate that systems or components in fact are Operable. Therefore, the proposed change has no significant effect on the Operability of structures, systems, or components or variables being within limits. As a result, the proposed change has no significant effect on the ability of equipment to mitigate accidents previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change revises SR 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The performance of Surveillances is a routine operation governed by approved procedures. Therefore, the proposed change will not introduce any new or different types of actions. The proposed change does not affect the design function or operation of the equipment involved. The proposed change will not introduce any credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change revises SR 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The proposed change allows time to perform the Surveillance when it is identified that the Surveillance cannot be performed before the

expiration of the specified Frequency. The existing risk assessment and administrative actions to be taken remain applicable and are unchanged. The provisions of SR 3.0.3 may only be used when there is reasonable assurance the Surveillance will meet the acceptance criteria when performed. The vast majority of Surveillances demonstrate that systems or components in fact are Operable. Therefore, the proposed change has no significant effect on the margin of safety provided by the Surveillance.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, the TSTF concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

5 Environmental Consideration

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

6 References

None

Attachment 1
Model Application

[DATE]

10 CFR 50.90

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

SUBJECT: PLANT NAME
DOCKET NO. 50-[xxx]
APPLICATION TO REVISE TECHNICAL SPECIFICATIONS TO
ADOPT TSTF-530, "CLARIFY SR 3.0.3 TO BE CONSISTENT WITH
GENERIC LETTER 87-09"

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the Technical Specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered.

Attachment 1 provides a description and assessment of the proposed changes. Attachment 2 provides the existing TS pages marked up to show the proposed changes. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides existing TS Bases pages for information marked to show the proposed changes.

Approval of the proposed amendment is requested by [date]. Once approved, the amendment shall be implemented within [] days.

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

[In accordance with 10 CFR 50.30(b), a license amendment request must be executed in a signed original under oath or affirmation. This can be accomplished by attaching a notarized affidavit confirming the signature authority of the signatory, or by including the following statement in the cover letter: "I declare under penalty of perjury that the foregoing is true and correct. Executed on (date)." The alternative statement is pursuant to 28 USC 1746. It does not require notarization.]

If you should have any questions regarding this submittal, please contact [NAME, TELEPHONE NUMBER].

Sincerely,

[Name, Title]

Attachments: 1. Description and Assessment
 2. Proposed Technical Specification Changes (Mark-Up)
 3. Revised Technical Specification Pages
 4. Proposed Technical Specification Bases Changes (Mark-Up)

cc: NRC Project Manager
 NRC Regional Office
 NRC Resident Inspector
 State Contact

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered, as described in TSTF-530, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09."

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the model safety evaluation dated [DATE] as part of the Federal Register Notice of Availability. This review included a review of the Nuclear Regulatory Commission (NRC) staff's evaluation, as well as the information provided in TSTF-530. [As described in the subsequent paragraphs,][LICENSEE] has concluded that the justifications presented in the TSTF-530 proposal and the model safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] TS.

2.2 Optional Changes and Variations

[LICENSEE is not proposing any variations or deviations from the TS changes described in the TSTF-530 or the applicable parts of the NRC staff's model safety evaluation dated [DATE].]
[LICENSEE is proposing the following variations from the TS changes described in the TSTF-530 or the applicable parts of the NRC staff's model safety evaluation dated [DATE].]

[The [PLANT] TS utilize different [numbering][and][titles] than the Standard Technical Specifications on which TSTF-530 was based. Specifically, [describe differences between the plant-specific TS numbering and/or titles and the TSTF-530 numbering and titles.] These differences are administrative and do not affect the applicability of TSTF-530 to the [PLANT] TS.]

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

[LICENSEE] requests adoption of TSTF-530, "Clarify SR 3.0.3 to be Consistent with Generic Letter 87-09," which is an approved change to the standard technical specifications (STS), into the [PLANT NAME, UNIT NOS] technical specifications (TS). The proposed change revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered.

[LICENSEE] has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed change revises Surveillance Requirement (SR) 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The performance of Surveillances is not an initiator to any accident previously evaluated. The provisions of SR 3.0.3 may only be used when there is reasonable assurance the Surveillance will meet the acceptance criteria when performed. The vast majority of Surveillances demonstrate that systems or components in fact are Operable. Therefore, the proposed change has no significant effect on the Operability of structures, systems, or components or variables being within limits. As a result, the proposed change has no significant effect on the ability of equipment to mitigate accidents previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed change revises SR 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The performance of Surveillances is a routine operation governed by approved procedures. Therefore, the proposed change will not introduce any new or different types of actions. The proposed change does not affect the design function or operation of the equipment involved. The proposed change will not introduce any credible new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing bases.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change revises SR 3.0.3 to allow time to complete a Surveillance not performed within the specified Frequency regardless of when failure to perform the Surveillance is discovered. The proposed change allows time to perform the Surveillance when it is identified that the Surveillance cannot be performed before the expiration of the specified Frequency. The existing risk assessment and administrative actions to be taken remain applicable and are unchanged. The provisions of SR 3.0.3 may only be used when there is reasonable assurance the Surveillance will meet the acceptance criteria when performed. The vast majority of Surveillances demonstrate that systems or components in

fact are Operable. Therefore, the proposed change has no significant effect on the margin of safety provided by the Surveillance.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, [LICENSEE] concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

Technical Specification Mark-Ups

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 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.

SR 3.0.2 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.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 ~~From the time it is discovered that a Surveillance has not been performed~~
~~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.

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.

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.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

BASES

SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

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-performed~~ 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 within its specified Frequency in accordance with SR 3.0.2, ~~and not at the time that the specified Frequency was not met.~~

BASES

SR 3.0.3 (continued)

There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and
- b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery.

This delay period provides an adequate time to ~~complete~~ perform the Surveillances ~~that have been missed~~. This delay period permits the performance completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance 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 performing ~~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, operating 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 within the specified Frequency ~~when specified~~, SR 3.0.3 allows for the full delay period of up to the specified 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 up

to 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

BASES

SR 3.0.3 (continued)

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 not performed within the specified Frequency 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 not performed within the specified Frequency will be placed in the licensee's Corrective Action Program.

If a Surveillance is not ~~completed-performed and met~~ 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.

Performing and meeting 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 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.

SR 3.0.2 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.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 ~~From the time it is discovered that a Surveillance has not been performed~~
~~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.

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.

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.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

BASES

SR 3.0.2 (continued)

25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations. 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-performed~~ 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 within its specified Frequency in accordance with SR 3.0.2, ~~and not at the time that the specified Frequency was not met.~~

There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and

b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery.

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

BASES

SR 3.0.3 (continued)

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating 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 within the specified Frequency~~when specified~~, SR 3.0.3 allows for the full delay period of up to the specified 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 up to 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 not performed within the specified Frequency 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 not performed within the specified Frequency will be placed in the licensee's Corrective Action Program.

BASES

SR 3.0.3 (continued)

If a Surveillance is not ~~completed-performed and met~~ 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.

~~Performing and meeting 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

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

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 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.

SR 3.0.2 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.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 ~~From the time it is discovered that a Surveillance has not been performed~~
~~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.

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.

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.

BASES

SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

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-performed~~ 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 within its specified Frequency in accordance with SR 3.0.2, ~~and not at the time that the specified Frequency was not met.~~

BASES

SR 3.0.3 (continued)

There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and
- b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery.

This delay period provides adequate time to ~~complete~~ perform the Surveillances ~~that have been missed~~. This delay period permits the performance completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance 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 performing ~~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, operating 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 within the specified Frequency ~~when specified~~, SR 3.0.3 allows for the full delay period of up to the specified 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 up

to 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

BASES

SR 3.0.3 (continued)

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 not performed within the specified Frequency 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 not performed within the specified Frequency will be placed in the licensee's Corrective Action Program.

If a Surveillance is not ~~completed-performed and met~~ 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.

Performing and meeting 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 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.

SR 3.0.2 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.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 ~~From the time it is discovered that a Surveillance has not been performed~~
~~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.

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.

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.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

BASES

SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Primary Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

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-performed~~ 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 within its specified Frequency in accordance with SR 3.0.2, ~~and not at the time that the specified Frequency was not met.~~

BASES

SR 3.0.3 (continued)

There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and
- b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery.

This delay period provides adequate time to ~~complete~~ perform the Surveillances ~~that have been missed~~. This delay period permits the performance completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance 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 performing ~~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, operating 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 within the specified Frequency ~~when specified~~, SR 3.0.3 allows for the full delay period of up to the specified 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 up

to 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

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SR 3.0.3 (continued)

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 not performed within the specified Frequency 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 not performed within the specified Frequency will be placed in the licensee's Corrective Action Program.

If a Surveillance is not ~~completed-performed and met~~ 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.

~~Performing and meeting 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 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.

SR 3.0.2 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.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 ~~From the time it is discovered that a Surveillance has not been performed~~
~~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.

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.

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.

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

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SR 3.0.2 (continued)

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Primary Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

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-performed~~ 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 within its specified Frequency in accordance with SR 3.0.2, ~~and not at the time that the specified Frequency was not met.~~

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SR 3.0.3 (continued)

There are two circumstances in which SR 3.0.3 may be used.

- a. If it is not possible to perform a Surveillance within the specified Frequency (for example, due to a scheduling error, adverse operational conditions, or failure of equipment needed to perform the Surveillance), then SR 3.0.3 may be applied at the point the Surveillance is not performed within the specified Frequency (i.e., it may be anticipated that a Surveillance will not be performed within the specified Frequency, but discovery may only occur when the specified Frequency expires); and
- b. If it is discovered that a Surveillance was not performed within the specified Frequency in the past, then SR 3.0.3 may be applied at the time of that discovery.

This delay period provides adequate time to ~~complete~~ perform the Surveillances ~~that have been missed~~. This delay period permits the performance completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance 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 performing ~~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, operating 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 within the specified Frequency ~~when specified~~, SR 3.0.3 allows for the full delay period of up to the specified 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 up

to 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

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SR 3.0.3 (continued)

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 not performed within the specified Frequency 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 not performed within the specified Frequency will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed-performed and met 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.

Performing and meeting 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.