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TRM2 - TECHNICAL REQUIREMENTS MANUAL UNIT 2

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SSES MANUAL

Manual Name: TRM2

Manual Title: TECHNICAL REQUIREMENTS MANUAL UNIT 2

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SUSQUEHANNA STEAM ELECTRIC STATION
LIST OF EFFECTIVE SECTIONS (TECHNICAL REQUIREMENTS MANUAL)

PPL Rev. 74

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3.0 TECHNICAL REQUIREMENT FOR OPERATION (TRO) APPLICABILITY

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

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

If the TRO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

TRO 3.0.3 When a TRO is not met, and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the following actions shall be taken:

1. Take compensatory actions as warranted for exiting TRO 3.0.3 commensurate with the safety significance of the condition. Development and implementation of the compensatory actions and plan for exit of TRO 3.0.3 shall be pursued without delay and in a controlled manner and shall be documented in the TRO 3.0.3 entry Condition Report.
2. Initiate a TRO 3.0.3 entry Condition Report that is coded Level 3 Evaluation to determine possible changes to the TRO that would preclude future entry into TRO 3.0.3.

When corrective measures are completed that permit operation in accordance with the TRO or the TRO actions, completion of the compensatory actions and plan for exiting TRO 3.0.3 is not required.

TRO 3.0.4 When a TRO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time.
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Requirement are stated in the individual TROs, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

(continued)

3.0 TECHNICAL REQUIREMENT FOR OPERATION (TRO) APPLICABILITY

TRO 3.0.4 (continued) Exceptions to this Requirement are stated in the individual Requirements. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

TRO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, the OPERABILITY of other equipment or variables to be within limits. This is an exception to TRO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

TRO 3.0.6 When a supported system TRO is not met solely due to a support system TRO or LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system TRO or LCO ACTIONS are required to be entered. This is an exception to TRO 3.0.2 for the supported system.

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

3.0 Technical Requirement Surveillance (TRS) Applicability

- TRS 3.0.1 TRS shall be met during the MODES or other specified conditions in the Applicability for individual TROs, unless otherwise stated in the TRS. 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 TRO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the TRO except as provided in TRS 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
-
- TRS 3.0.2 The specified Frequency for each TRS 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 Requirement are stated in the individual Requirements.
-
- TRS 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the TRO 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. In the event it is determined that a Surveillance cannot be performed within its specified Frequency, compliance with the requirement to declare the TRO not met may be delayed, from the expiration of the current Surveillance test interval, 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.

(continued)

3.0 Technical Requirement Surveillance (TRS) Applicability

TRS 3.0.3 (continued) If the Surveillance is not performed within the delay period, the TRO 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 TRO must immediately be declared not met, and the applicable Condition(s) must be entered.

Exceptions to this Requirement are stated in the individual Requirements.

TRS 3.0.4 Entry into a MODE or other specified condition in the Applicability of a TRO shall not be made unless the TRO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with Actions or that are part of a shutdown of the unit.

TRS 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

3.8 Electrical Power

3.8.1 Primary Containment Penetration Conductor Overcurrent Protective Devices

TRO 3.8.1 The primary containment penetration conductor overcurrent protective devices in Table 3.8.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3

ACTIONS

-----NOTE-----

Separate condition entry is allowed for each device.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetration conductor overcurrent protective devices inoperable.	A.1 Deenergize the circuit(s) and declare the affected system or component inoperable.	72 hours
	<u>AND</u> A.2 Verify affected circuit deenergized.	Once per 7 days
B. Required Action and associated Completion Time for Condition A not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours

TECHNICAL REQUIREMENT SURVEILLANCE

SURVEILLANCE		FREQUENCY
TRS 3.8.1.1	<p>-----NOTE-----</p> <p>For each circuit breaker found inoperable, an additional representative sample of $\geq 10\%$ of all the circuit breakers of the inoperable type shall be functionally tested until no more failures are found or all circuit breakers of that type have been functionally tested.</p> <p>-----</p> <p>Perform a functional test on a representative sample of $\geq 10\%$ of each type of lower voltage circuit breaker.</p>	24 months
TRS 3.8.1.2	Perform a functional test on each overcurrent relay.	24 months
	<p>-----NOTE-----</p> <p>The provisions of TRS 3.0.2 are not applicable</p> <p>-----</p>	
TRS 3.8.1.3	Subject each circuit breaker to inspection and preventive maintenance.	120 months

TABLE 3.8.1-1 (Page 1 of 2)
PRIMARY CONTAINMENT PENETRATION CONDUCTOR
OVERCURRENT PROTECTIVE DEVICES

Circuit Breaker Designation			System/Equipment Powered
A.	Type 150A Frame – Thermal Magnetic		
1.	2B237043	2B237043A	Rx Recirc/HV-B31-2F023A
2.	2B219022	2B219022A	Rx Recirc/HV-B31-2F031A
3.	2B219023	2B219023A	Rx Recirc/HV-B31-2F032A
4.	2B246011	2B246011A	Rx Recirc/HV-B31-2F023B
5.	2B229022	2B229022A	Rx Recirc/HV-B31-2F031B
6.	2B229023	2B229023A	Rx Recirc/HV-B31-2F032B
7.	2B236042	2B236042A	Drywell Air Flow/2V411A
8.	2B236032	2B236032A	Drywell Air Flow/2V412A
9.	2B236011	2B236011A	Drywell Air Flow/2V413A
10.	2B236033	2B236033A	Drywell Air Flow/2V414A
11.	2B236053	2B236053A	RWCU/HV-G33-2F001
12.	2B236082	2B236082A	Drywell Air Flow/2V415A
13.	2B236043	2B236043A	Drywell Air Flow/2V416A
14.	2B236021	2B236021A	Drywell Air Flow/2V417A
15.	2B246091	2B246091A	Drywell Air Flow/2V411B
16.	2B246103	2B246103A	Drywell Air Flow/2V412B
17.	2B246102	2B246102A	Drywell Air Flow/2V413B
18.	2B246061	2B246061A	Drywell Air Flow/2V414B
19.	2B246072	2B246072A	Drywell Air Flow/2V415B
20.	2B246081	2B246081A	Drywell Air Flow/2V416B
21.	2B246051	2B246051A	Drywell Air Flow/2V417B
22.	2B236123	2B236123A	Drywell Air Flow/2V418A
23.	2B246121	2B246121A	Drywell Air Flow/2V418B
24.	2B236052	2B236052A	RHR/HV-E11-2F009
25.	2B237073	2B237073A	RHR/HV-E11-2F022
26.	2B237082	2B237082A	HPCI/HV-E41-2F002
27.	2B253021	2B253021A	NSSS/HV-B21-2F011A
28.	2B263023	2B263023A	NSSS/HV-B21-2F011B
29.	2B253041	2B253041A	MSIV Hoist/TBB25
30.	2B263021	2B263021A	MSIV Hoist/TBB26

(continued)

TABLE 3.8.1-1 (Page 2 of 2)
PRIMARY CONTAINMENT PENETRATION CONDUCTOR
OVERCURRENT PROTECTIVE DEVICES

	Circuit Breaker Designation		System/Equipment Powered
B.	Type 150A Frame - Magnetic		
1.	2B236023	2B236023A	Cont. Inst. Gas/HV-22603
2.	2B246022	2B246022A	RCIC/HV-E51-2F007
3.	2B237072	2B237072A	NSSS/HV-B21-2F016
4.	2B236102	2B236102A	NSSS/HV-B21-2F001
5.	2B246112	2B246112A	NSSS/HV-B21-2F002
6.	2B246113	2B246113A	NSSS/HV-B21-2F005
7.	2B253052	2B253052A	RWCU/HV-G33-2F102
8.	2B263043	2B253043A	RWCU/HV-G33-2F100
9.	2B263052	2B263052A	RWCU/HV-G33-2F106
10.	2B246062	2B246062A	RBCCW/HV-21346
11.	2B246012	2B246012A	RBCCW/HV-21345
12.	2B253063	2B253063A	Drywell Sump/2P402A
13.	2B263071	2B263071A	Drywell Sump/2P402B
14.	2B253043	2B253043A	Drywell Sump/2P403A
15.	2B263072	2B263072A	Drywell Sump/2P403B
C.	Type 250A Frame – Thermal Magnetic		
1.	2B216092	2B216083	Cont. H2 Recombiner/2E440A
2.	2B226103	2B226102	Cont. H2 Recombiner/2E440B
3.	2B236103	2B236121	Cont. H2 Recombiner/2E440C
4.	2B246032	2B246033	Cont. H2 Recombiner/2E440D
D.	Circuit Breakers Tripped by Overcurrent Relays		
1.	2A20501	2A20502	Rx Recirc/2P401A
2.	2A20601	2A20602	Rx Recirc/2P401B

3.8 Electrical Power

3.8.3 Diesel Generator (DG) Maintenance Activities

TRO 3.8.3 The Technical Requirements Surveillances specified in this TRO shall be performed at the Frequency specified for each DG.

APPLICABILITY: When the associated DG is required to be OPERABLE

ACTIONS

NOTE

1. Separate condition entry is allowed for each Diesel Generator.
2. TRO 3.0.4.b is not applicable to DGs.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. TRO requirements not met.	A.1 Declare affected DG inoperable.	Immediately

TECHNICAL REQUIREMENT SURVEILLANCE

SURVEILLANCE		FREQUENCY
TRS 3.8.3.1	Inspect diesel in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.	5 years
TRS 3.8.3.2	Verify that the auto-connected loads to each diesel generator do not exceed the 2000-hour rating of 4700 kW.	24 months

(continued)

TECHNICAL REQUIREMENT SURVEILLANCE (continued)

SURVEILLANCE		FREQUENCY
TRS 3.8.3.3	Verify that the following diesel generator lockout features do not prevent diesel generator starting and/or operation when not required: a. Engine overspeed. b. Generator differential. c. Engine low lube oil pressure.	24 months
TRS 3.8.3.4	For each fuel oil storage tank a. Drain the fuel oil; b. Remove the sediment, and c. Clean the tank	10 years
TRS 3.8.3.5	Perform a pressure test of those portions of the fuel oil system designed to Section III, Subsection ND of the ASME Code in accordance with ASME Code Section XI Article IWD-5000.	10 years

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3.8 Electrical Power

3.8.6 Emergency Switchgear Room Cooling

TRO 3.8.6 Two Emergency Switchgear Room Cooling subsystems shall be OPERABLE.

APPLICABILITY: Whenever associated emergency switchgear is required to be OPERABLE

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required Unit 2 Emergency Switchgear Room Cooling subsystem inoperable.	A.1 -----NOTE----- Applicable only in MODES 1, 2, or 3. ----- Restore subsystem to OPERABLE status.	30 days
B. Two required Unit 2 Emergency Switchgear Room Cooling subsystems inoperable.	B.1 -----NOTE----- Applicable only in MODES 1, 2, or 3. ----- Restore at least one required subsystem to OPERABLE status. <u>AND</u>	12 hours (continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
	<p>B.2 -----NOTE-----</p> <p>Applicable only in MODES 4, 5, or OPDRVs, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment.</p> <p>-----</p> <p>Suspend CORE ALTERATIONS, OPDRVs, and handling irradiated fuel in the secondary containment.</p> <p>AND</p>	Immediately
	<p>B.3 -----NOTE-----</p> <p>Applicable only in MODES 4, 5, or OPDRVs, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment.</p> <p>-----</p> <p>Restore at least one required subsystem to OPERABLE status.</p>	72 hours
C. Required Action and associated Completion Time of Condition A or B not met	C.1 Declare affected distribution system inoperable and take Actions required by – Unit 2 LCO 3.8.7 or LCO 3.8.8.	Immediately
D. One required Unit 1 Emergency Switchgear Room Cooling subsystem inoperable.	<p>D.1 -----NOTE-----</p> <p>Applicable only in Unit 2 MODES 1, 2, or 3.</p> <p>-----</p> <p>Restore subsystem to OPERABLE status.</p>	30 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Two required Unit 1 Emergency Switchgear Room Cooling subsystems inoperable.	<p>E.1 -----NOTE-----</p> <p>Applicable only in Unit 2 MODES 1, 2, or 3.</p> <p>-----</p> <p>Restore at least one required subsystem to OPERABLE status.</p> <p><u>AND</u></p>	12 hours
	<p>E.2 -----NOTE-----</p> <p>Applicable only in Unit 2 MODES 4, 5, or OPDRV's, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment.</p> <p>-----</p> <p>Suspend CORE ALTERATIONS, OPDRVs, and handling irradiated fuel in the secondary containment.</p> <p><u>AND</u></p>	Immediately
	<p>E.3 -----NOTE-----</p> <p>Applicable only in Unit 2 MODES 4, 5, or OPDRV's, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment.</p> <p>-----</p> <p>Initiate action to restore one subsystem to OPERABLE status.</p>	Immediately
		(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. Required Action and associated Completion Time of Condition D or E not met.	F.1 Declare affected distribution system inoperable and take actions required by Unit 1 LCO 3.8.7 or LCO 3.8.8.	Immediately

TECHNICAL REQUIREMENT SURVEILLANCE

SURVEILLANCE		FREQUENCY
TRS 3.8.6.1	Administratively verify that the Unit 2 Emergency Switchgear Room Cooling Fans (2V222) are available.	24 hours
TRS 3.8.6.2	Verify that the Emergency Switchgear Room Cooler Chiller (2K210) will run for at least 60 minutes.	92 days
TRS 3.8.6.3	Verify each Emergency Switchgear Room Cooler Chiller (2K210) has the capability to maintain the design temperature of the emergency switchgear and load center rooms.	24 months

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TROs	TRO 3.0.1 through TRO 3.0.6 establish the general requirements applicable to all Requirements and apply at all times, unless otherwise stated.
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TRO 3.0.1	TRO 3.0.1 establishes the Applicability statement within each individual Requirement as the requirement for when the TRO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Requirement).
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TRO 3.0.2	TRO 3.0.2 establishes that upon discovery of a failure to meet a TRO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of a TRO are not met. This Requirement establishes that:
-----------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the TRO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.2 (continued) Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS. The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when a TRO is met or is no longer applicable, unless otherwise stated in the individual Requirements.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual TRO's Actions specify the Required Actions where this is the case. An example of this is in Technical Requirement TRO 3.4.1, "Chemistry."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, modifications, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these or for any other reasons must be done in a manner that does not compromise safety.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.2 Individual Requirements may specify a time limit for performing a TRS when
(continued) equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Requirement becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Requirement becomes applicable and the ACTIONS Condition(s) are entered.

TRO 3.0.3 TRO 3.0.3 establishes the actions that must be implemented when a TRO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies; or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Certain combinations of Conditions may exist such that entering TRO 3.0.3 is warranted; in such cases, the Actions specifically state a Condition corresponding to such combinations and also that TRO 3.0.3 be entered immediately.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.3 (continued) Because entry into the 3.0.3 ACTION is an escalation of the system, structure, component, or unit condition, a Condition Report is required. The Condition Report will address plant safety given the nonconformance with the Technical Requirement. TROs which affect OPERABILITY of TS Functions will have an assessment of TS OPERABILITY.

Compensatory actions and a plan for exiting TRO 3.0.3 shall be developed and implemented in a timely manner commensurate with the safety significance of the entry condition. This will allow for an orderly development of actions and plans providing for time to coordinate any actions deemed unwarranted with the station work schedule.

TRO 3.0.3 entries are undesirable and should be avoided whenever possible. Thus, it is important to evaluate the TRO 3.0.3 entry circumstances to determine if changes to the TRO not met can be made that would preclude the need for future TRO 3.0.3 entries. Completion of the evaluation is not required to exit TRO 3.0.3. The evaluation shall be performed even though TRO 3.0.3 has been/will be exited.

TRO 3.0.4 TRO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when a TRO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the TRO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the TRO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptance level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Requirement 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.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

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

TRO 3.0.4 is not applicable to TROs that are identified as APPLICABLE "At all times." This term is considered to constitute one inclusive operating condition that corresponds to and encompasses all MODES as defined in the Technical Specification, as well as all special operating conditions, including when the reactor vessel is defueled. Entry into any MODE or other special condition is done within the context of "all times," and, therefore, is not a change within the Applicability to which TRO 3.0.4 applies.

TRO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the TRO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of TRO 3.0.4(b), must take into account all inoperable Technical Requirements Manual equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.4
(continued) condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the TRO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

TRO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The TRO 3.0.4.b risk assessments do not have to be documented.

The Technical Requirements allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the TRO, the use of the TRO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, the Emergency Diesel Generators (TRO 3.8.3) have been determined to be more important to risk and use of the TRO 3.0.4.b allowance is prohibited. A note is included in TRO 3.8.3 stating that TRO 3.0.4.b is not applicable.

Other exceptions to TRO 3.0.4 are stated in the individual Requirements. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Requirement.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by TRS 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with TRO 3.0.4 or where an exception to TRO 3.0.4 is stated, is not a violation of TRS 3.0.1 or TRS 3.0.4 for those surveillances that do not have to be performed due to the associated inoperable equipment. However, TRSs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected TRO.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.5 TRO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Requirement is to provide an exception to TRO 3.0.2 (e.g., to not comply with the applicable Required Action(s) to allow the performance of TRSs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment; or
- c. That variables are within limits

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed TRSs. This Requirement does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the TRSs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of a TRS on another channel in the other trip system. A similar example of appropriate response during the performance of an TRS on another channel in the same trip system.

(continued)

B 3.0 Technical Requirement for Operation (TRO) Applicability

BASES

TRO 3.0.6 TRO 3.0.6 establishes an exception to TRO 3.0.2 for support systems that have a TRO or LCO specified in the Technical Requirement Specifications (TRS) or Technical Specification (TS). This exception is provided because TRO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system TRO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the plant is maintained in a safe condition are specified in the support system TRO's or LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is a TRO or LCO specified for it in the TRS or TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with TRO 3.0.2.

B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRS TRS 3.0.1 through TRS 3.0.4 establish the general requirements applicable to all Requirements and apply at all times, unless otherwise stated.

TRS 3.0.1 TRS 3.0.1 establishes the requirement that TRSs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the TRO apply, unless otherwise specified in the individual TRSs. This Requirement is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with TRS 3.0.2, constitutes a failure to meet a TRO.

Systems and components are assumed to be OPERABLE when the associated TRSs have been met. Nothing in this Requirement, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the TRSs; or
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated TRO are not applicable, unless otherwise specified.

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in

(continued)

B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRS 3.0.1 (continued) accordance with TRS 3.0.2, prior to returning equipment to OPERABLE status. Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with TRS 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

TRS 3.0.2 TRS 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per ..." interval.

TRS 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

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 TRSs. The exceptions to TRS 3.0.2 are

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B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRO 3.0.2
(continued)

those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Requirements. As stated in TRS 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 TRS 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.

TRS 3.0.3

TRS 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 TRS 3.0.2, and not at the time that the specified Frequency was not met.

If a Surveillance cannot be performed within its specified Frequency due to unusual conditions, such as a structure, system, or component configuration that prevents performance of a test, or performance of the test would have an adverse impact on plant risk, compliance with the requirement to declare the TRO not met may be delayed. This delay period starts at the expiration of the current Surveillance test interval. The delay can be up to 24 hours or up to the limit of the specified Frequency, whichever is greater.

This delay period provides 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.

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B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRS 3.0.3
(continued)

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, 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 when specified, TRS 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.

TRS 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 TRSs is expected to be an infrequent occurrence. Use of the delay period established by TRS 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

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B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRS 3.0.3
(continued)

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 Surveillances whose Frequency has been extended in accordance with TRS 3.0.3 will be placed in the 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 TRO 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 TRO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Requirement, or within the Completion Time of the ACTIONS, restores compliance with TRS 3.0.1.

Exceptions to TRS 3.0.3 are provided in instances where requiring equipment to be considered inoperable, in accordance with TRS 3.0.3, would not provide appropriate remedial measures for the associated condition. An example of this is in TRO 3.11.4.1, "Radiological Environmental Monitoring." TRO 3.11.4.1 has surveillances that implement required environmental sampling and analysis. If a portion of the sampling or analysis is not completed as required, the programmatic response is to report the condition to the Nuclear Regulatory Commission and in most instances describe the corrective actions taken to correct the condition. There are no result

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B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

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TRS 3.0.3 (continued)	thresholds built into the monitoring and analysis program that would result in declaring equipment inoperable or in a plant shutdown. Therefore, it is appropriate that the provisions of TRO 3.0.3 be waived for this TRO. These exceptions are addressed in the individual Requirements.
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TRS 3.0.4	TRS 3.0.4 establishes the requirement that all applicable TRSs must be met before entry into a MODE or other specified condition in the Applicability. This Requirement 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.
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The provisions of this Requirement 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 a TRS will not result in TRS 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 TRS(s) are not required to be performed per TRS 3.0.1, which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, TRS 3.0.4 does not apply to the associated TRS(s) since the requirement for the TRS(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an TRS 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the TRO is not met in this instance, TRO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. The provisions of TRS 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of TRO 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 TRSs are specified such that exceptions to TRS 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the TRSs are specified in the Frequency, in the Surveillance, or both.

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B 3.0 TECHNICAL REQUIREMENT SURVEILLANCE (TRS) APPLICABILITY

BASES

TRS 3.0.4
(continued)

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 TRO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the TRO 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 TRS's annotation is found in Section 1.4, Frequency.

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

B 3.8.6 Emergency Switchgear Room Cooling

BASES

TRO	<p>The Emergency Switchgear Room Cooling (ESRC) system provides heat removal capability for the Unit 2 emergency switchgear (Room designation II-406 and II-407) and load center rooms (Room designation II-507 and II-510) which contain equipment that is required to operate during the mitigation of a design basis event. The room cooling system provides the primary means to remove heat from the equipment located in these rooms. (Reference 1)</p> <p>Two 100% capacity cooling subsystems provide the normal and emergency ventilation for the emergency switchgear and load center rooms.</p> <p>This requirement does not include equipment used in the normal cooling mode, which serves no post accident function. It includes the Switchgear Room Cooling Direct Expansion (DX) Units. The equipment required for the 'A' subsystem of the ESRC system is:</p> <p>'A' Emergency Switchgear Fan – 2V222A 'A' Cooling Coil – 2E296A DX Unit and Associated Equipment – 2K210A</p> <p>Note that the 'A' DX unit transfers heat to the 'A' ESW subsystem (Technical Specification 3.7.2).</p> <p>The equipment required for the 'B' subsystem of the ESRC system is:</p> <p>'B' Emergency Switchgear Fan – 2V222B 'B' Cooling Coil – 2E296B DX Unit and Associated Equipment – 2K210B</p> <p>Note that the 'B' DX unit transfers heat to the 'B' ESW subsystem (Technical Specification 3.7.2).</p> <p>Additionally, the associated ductwork, dampers and associated instrumentation and controls are also required.</p> <p>Each Unit 2 ESRC subsystem provides cooling for the Unit 2 emergency switchgear and load center rooms, which contain equipment from different electrical divisions (e.g., the 'A' ESRC subsystem cools both Division I and II electrical equipment). Unlike the Unit 1 ESRC system, no common equipment is cooled by the Unit 2 ESRC system.</p>
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B 3.8.6 Emergency Switchgear Room Cooling

BASES**ACTIONS**

The Actions are defined to ensure proper corrective measures are taken in response to the inoperable components.

These actions are based on the relative impact of ESRC operability on the ability of the equipment in the Unit 2 Emergency Switchgear and Load Center to perform their safety function. Similar actions for the Unit 1 ESRC system is included in the Unit 2 TRM, since the Unit 1 ESRC system cools common equipment.

With one required Emergency Switchgear Room Cooling subsystem inoperable (Condition A) in MODES 4 or 5, during OPDRVs, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment, no action is provided or need be taken in response to the condition. With one ESRC subsystem inoperable in Modes 1, 2 or 3, the inoperable ESRC subsystem must be restored to OPERABLE status within 30 days. With the unit in this condition, the remaining OPERABLE ESRC subsystem is adequate to perform the cooling function. However, the overall reliability is reduced since a single failure in the OPERABLE subsystem results in a loss of the cooling function. The 30 day completion time is based on the consideration that the remaining subsystem can provide the required protection, and the availability of alternate non safety cooling methods.

With two required Unit 2 Emergency Switchgear Room Cooling subsystems inoperable (Condition B), one subsystem must be restored to OPERABLE status within 12 hours in Modes 1, 2 or 3. This 12 hour completion time is based on temperature rise calculations which show that switchgear functionality will not be impacted by a loss of switchgear cooling for this timeframe. In Modes 4 or 5, CORE ALTERATIONS, OPDRVs and handling irradiated fuel within secondary containment should be suspended immediately. This will reduce challenges to systems supported by the ESRC systems needed to mitigate the consequences of a fuel handling event. Additionally, one subsystem must be restored to OPERABLE status within 72 hours in Modes 4 or 5. This 72 hour completion time is based on temperature rise calculations which show that switchgear functionality will not be impacted by a loss of switchgear cooling for this timeframe.

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B 3.8.6 Emergency Switchgear Room Cooling

BASES

ACTIONS
(continued)

LCO 3.8.7 is entered in the event that the Required Action and associated Completion Time of Condition A or B are not met in MODES 1, 2 or 3. LCO 3.8.8 is entered in the event that the Required Action and associated Completion Time of Condition B are not met in MODES 4 or 5, or during OPDRVs, CORE ALTERATIONS, or when handling irradiated fuel in the secondary containment. Note that some common equipment is located in the Unit 1 switchgear and load center rooms. If Unit 1 LCO 3.8.7 or LCO 3.8.8 is entered, Unit 2 operation will be impacted due to common systems being inoperable. Therefore, loss of one or both Unit 1 ESRC subsystems requires entry into Unit 2 TRM 3.8.6 "Emergency Switchgear Room Cooling." Note that the rooms cooled by the Unit 2 ESRC system do not contain Unit 1 or Common system equipment. Therefore, entry into Unit 1 TRO 3.8.6 is not required if the Unit 1 ESRC subsystems are OPERABLE even if the Unit 2 ESRC system is INOPERABLE.

TRS

The TRSs are defined to be performed at the specified Frequency to ensure that the systems are maintained OPERABLE.

REFERENCE 1. FSAR Section 9.4.2.2
