

## ATTACHMENT I

Contents Replace Proposed Technical Specifications

in Attachment C of PCN-238

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## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

4.0.3 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. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(1).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

### 3/4.0 APPLICABILITY

#### BASES

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Specification 3.0.1 through 3.0.4 establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

"Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL MODES or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met.

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in a MODE or condition in which the specification no longer applies. It is not intended that the shutdown ACTION requirements be used as an operational convenience which permits (routine) voluntary removal of a system(s) or components(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

The specified time limits of the ACTION requirements are applicable from the point in time it is identified that a Limiting Condition for Operation is not met. The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the ACTION requirements are applicable when this limit expires if the surveillance has not been completed. When a shutdown is required to comply with ACTION requirements, the plant may have entered a MODE in which a new specification becomes applicable. In this case, the time limits of the

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

Specification 3.0.2 establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated ACTION requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the ACTION requirements within the specified time interval constitutes compliance with a specification and (2) completion of the remedial measures of the ACTION requirements is not required when compliance with a Limiting Condition of Operation is restored within the time interval specified in the associated ACTION requirements.

Specification 3.0.3 establishes the shutdown ACTION requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated ACTION requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown MODE when plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its ACTION requirements. It is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. One hour is allowed to prepare for an orderly shutdown before initiating a change in plant operation. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the cooldown capabilities of the facility assuming only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which this specification applies.

If remedial measures permitting limited continued operation of the facility under the provisions of the ACTION requirements are completed, the shutdown may be terminated. The time limits of the ACTION requirements are applicable from the point in time there was a failure to meet a Limiting Condition for Operation. Therefore, the shutdown may be terminated if the ACTION requirements have been met or the time limits of the ACTION requirements have not expired, thus providing an allowance for the completion of the required actions.

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in the COLD SHUTDOWN MODE when a shutdown is required during the POWER MODE of operation. If the plant is in a lower MODE of operation when a shutdown is

### 3/4.0 APPLICABILITY

#### BASES (Con't)

required, the time limit for reaching the next lower MODE of operation applies. However, if a lower MODE of operation is reached in less time than allowed, the total allowable time to reach COLD SHUTDOWN, or other applicable MODE, is not reduced. For example, if HOT STANDBY is reached in 2 hours, the time allowed to reach HOT SHUTDOWN is the next 11 hours because the total time to reach HOT SHUTDOWN is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to POWER operation, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into a MODE or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher MODE of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower MODE of operation.

The shutdown requirements of Specification 3.0.3 do not apply in MODES 5 and 6, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on MODE changes when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher MODE of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in MODES were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher MODES of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. ~~Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a MODE change. Therefore, in this case, entry into an OPERATIONAL MODE or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.~~

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower MODE of operation.

*Exceptions to this specification have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.*

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. permits an allowable extension for the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specifications 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(1)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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Surveillance 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and component ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

Specification 4.0.5 establishes the requirements that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

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## **ATTACHMENT II**

**Contents Replace Proposed Technical Specifications**

**in Attachment D of PCN-238**

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

4.0.3 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. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2 and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(1).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

### 3/4.0 APPLICABILITY

#### BASES

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Specification 3.0.1 through 3.0.4 establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

"Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL MODES or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met.

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in a MODE or condition in which the specification no longer applies. It is not intended that the shutdown ACTION requirements be used as an operational convenience which permits (routine) voluntary removal of a system(s) or components(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

The specified time limits of the ACTION requirements are applicable from the point in time it is identified that a Limiting Condition for Operation is not met. The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the ACTION requirements are applicable when this limit expires if the surveillance has not been completed. When a shutdown is required to comply with ACTION requirements, the plant may have entered a MODE in which a new specification becomes applicable. In this case, the time limits of the

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

Specification 3.0.2 establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated ACTION requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the ACTION requirements within the specified time interval constitutes compliance with a specification and (2) completion of the remedial measures of the ACTION requirements is not required when compliance with a Limiting Condition of Operation is restored within the time interval specified in the associated ACTION requirements.

Specification 3.0.3 establishes the shutdown ACTION requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated ACTION requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown MODE when plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its ACTION requirements. It is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. One hour is allowed to prepare for an orderly shutdown before initiating a change in plant operation. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the cooldown capabilities of the facility assuming only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which this specification applies.

If remedial measures permitting limited continued operation of the facility under the provisions of the ACTION requirements are completed, the shutdown may be terminated. The time limits of the ACTION requirements are applicable from the point in time there was a failure to meet a Limiting Condition for Operation. Therefore, the shutdown may be terminated if the ACTION requirements have been met or the time limits of the ACTION requirements have not expired, thus providing an allowance for the completion of the required actions.

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in the COLD SHUTDOWN MODE when a shutdown is required during the POWER MODE of operation. If the plant is in a lower MODE of operation when a shutdown is

### 3/4.0 APPLICABILITY

#### BASES (Con't)

required, the time limit for reaching the next lower MODE of operation applies. However, if a lower MODE of operation is reached in less time than allowed, the total allowable time to reach COLD SHUTDOWN, or other applicable MODE, is not reduced. For example, if HOT STANDBY is reached in 2 hours, the time allowed to reach HOT SHUTDOWN is the next 11 hours because the total time to reach HOT SHUTDOWN is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to POWER operation, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into a MODE or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher MODE of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower MODE of operation.

The shutdown requirements of Specification 3.0.3 do not apply in MODES 5 and 6, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on MODE changes when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher MODE of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in MODES were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher MODES of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a MODE change. Therefore, in this case, entry into an OPERATIONAL MODE or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower MODE of operation.

*Exceptions to this specification have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.*

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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Specifications 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. permits an allowable extension for the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specifications 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(1)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

### 3/4.0 APPLICABILITY

#### BASES (Con't)

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Surveillance 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and component ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower MODE of operation.

Specification 4.0.5 establishes the requirements that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

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