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PG&E Letter DCL-16-104

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

10 CFR 50.90

Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2

Technical Specification Changes for License Amendment Request 13-02,
"Revision to Technical Specifications to Adopt Risk Informed Completion
Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion
Times – RITSTF Initiative 4B'"

- Reference: 1. PG&E Letter DCL-13-106, "License Amendment Request 13-02, Revision to Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B,'" dated November 25, 2013 (ADAMS Accession No. ML13330A557)
2. PG&E Letter DCL-15-007, "Response to NRC Request for Additional Information Regarding License Amendment Request 13-02, 'Revision to Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B,'" dated February 5, 2015 (ADAMS Accession No. ML15036A592)
3. NRC Letter from Siva P. Lingam to Edward D. Halpin, PG&E, "Diablo Canyon Power Plant, Unit Nos. 1 and 2 - Issuance of Amendments Regarding Revision to Technical Specifications to Adopt Technical Specification Task Force (TSTF) Traveler TSTF-432, Revision 1, 'Change in Technical Specifications End States (WCAP-16294)' (TAC Nos. MF4521 and MF4522)", dated August 27, 2015 (ADAMS Accession No. ML15204A222)

Dear Commissioners and Staff:

In Reference 1, Pacific Gas and Electric Company (PG&E) submitted License Amendment Request (LAR) 13-02 that proposes an amendment that would modify technical specification (TS) requirements to permit the use of risk informed completion times (RICTs) in accordance with Technical Specifications Task Force-505 (TSTF-505), Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b."



In Reference 2, PG&E submitted responses to NRC Staff Requests for Additional Information (RAIs) which, in part, revised the proposed TS changes to implement TSTF-505.

In Reference 3, the Staff issued license amendments 219 (Unit 1) and 221 (Unit 2) to risk-inform TS requirements regarding selected Required Action End States, consistent with TSTF-432, Revision 1, "Change in Technical Specifications End States (WCAP-16294)." These amendments have resulted in changes to TS within the scope of LAR 13-02, and require revisions to the Reference 1 TS page markups.

On June 20, 2016, the NRC held a public meeting to discuss issues associated with TSTF-505 applications. At the meeting, the NRC stated that a revision to the TS Section 5 RICT Program to limit the use of a RICT to 24 hours would facilitate addressing staff issues related to occurrence of an emergent condition where there is a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. The industry believes a two-tiered RICT is appropriate for these emergent conditions, 24 hours or 7 days depending on the calculated online risk during the RICT. PG&E believes a 7-day RICT can be justified for these emergent conditions when online risk is low. However, PG&E is voluntarily proposing a TS Section 5 RICT Program change to limit the RICT to 24 hours to expedite the NRC approval for Diablo Canyon Power Plant.

In its original submittal of LAR 13-02, the proposed TS markup pages 3.3-29 and 3.3-30 contained inadvertent changes that were not part of the TSTF-505 proposed changes. This letter provides revised TS pages 3.3-29 and 3.3-30 that only contain the TSTF-505 proposed changes.

The Enclosure provides a description of the proposed revisions. Attachment 1 of the Enclosure provides marked-up TS pages to show the proposed changes. Attachment 2 of the Enclosure provides revised (clean) TS pages. Attachment 3 of the Enclosure provides marked-up TS Bases pages to show the proposed changes. These revised TS and TS Bases supersede those previously provided in References 1 and 2.

This information does not affect the results of the technical evaluation or the no significant hazards consideration determination previously transmitted in Reference 1.

This communication contains one revised commitment (as defined in NEI 99-04) in Attachment 4 of the Enclosure.

If you have any questions, or require additional information, please contact Mr. Michael Richardson at (805) 545-4557.



I state under penalty of perjury that the foregoing is true and correct.

Executed on October 27, 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'James M. Welsch'.

James M. Welsch
Vice President, Nuclear Generation

kjse/4328/50467285

Enclosure

cc: Diablo Distribution
cc/enc: Kriss M. Kennedy, NRC Region IV Administrator
Christopher W. Newport, NRC Senior Resident Inspector
Gonzalo L. Perez, Branch Chief, California Department of Public Health
Balwant K. Singal, NRC Senior Project Manager

**Technical Specification Changes for License Amendment Request 13-02,
“Revision to Technical Specifications to Adopt Risk Informed Completion
Times TSTF-505, Revision 1, ‘Provide Risk-Informed Extended Completion
Times – RITSTF Initiative 4B’”**

Proposed Change to TS 5.5.20.e

On June 20, 2016, the NRC held a public meeting to discuss issues for Technical Specification Task Force (TSTF)-505 applications. At the meeting, the NRC stated that a revision to the Technical Specification (TS) Section 5 Risk-Informed Completion Time (RICT) Program to limit the use of a RICT to 24 hours would facilitate addressing Staff issues related to occurrence of an emergent condition where there is a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. Therefore, PG&E is voluntarily proposing this change to the License Amendment Request (LAR) for TSTF-505 contained in PG&E Letter DCL-13-106, “License Amendment Request 13-02, Revision to Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, ‘Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B,’” dated November 25, 2013. A revised INSERT 38 is included in Attachment 1 to this Enclosure that provides this 24-hour limitation in TS 5.5.20, Part e. The new retyped (clean) TS page 5.0-17b is contained in Attachment 2 to the Enclosure. This change results in a change to a prior commitment as discussed in Attachment 4 to the Enclosure.

Changes to TS Due to TS End States Amendments

On August 27, 2015, the Staff issued license amendments 219 (unit one) and 221 (unit two) to provide risk-informed TS requirements regarding selected Required Action End States, consistent with TSTF-432, Revision 1, “Change in Technical Specifications End States (WCAP-16294),” based on PG&E Letter DCL-14-058, “License Amendment Request 14-03, License Amendment Request for Adoption of Technical Specification Task Force Traveler TSTF-432, Revision 1, ‘Change in Technical Specification End States (WCAP-16294),’” dated July 28, 2014 (ADAMS Accession No. ML14209B076). These amendments have resulted in changes to TS within the scope of the TSTF-505 LAR 13-02, and require revisions to the original submittal to make conforming changes, as well as to provide current TS pages for implemented amendments 219 and 221 marked up for the TSTF-505 changes.

TSTF-505 added new Conditions to several TS within its scope to address multiple inoperable trains, and used the existing default Conditions for a MODE 5 shutdown for these new Conditions when the Required Action and Completion Time is not met. PG&E has determined that a MODE 5 shutdown is still the appropriate default action for these new Conditions. Since the TS End States amendments changed the default Condition to be a MODE 4 shutdown, PG&E is proposing to restructure the affected TS to provide a separate MODE 5 shutdown default Condition

applicable to the new TSTF-505 Conditions. The TS changes for TSTF-505 for the revised TS End States were submitted to the NRC in Attachment 4 to the Enclosure of PG&E Letter DCL-14-058.

The following describes the proposed changes to address the TS End States amendments:

- TS 3.3.2 Condition B (page 3.3-19): The TS End States amendments changed Required Action B.2.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 deleted this Required Action from Condition B, and provided a separate Condition to address plant shutdown. A new proposed markup to the revised page 3.3-19 is provided. The default shutdown action for Condition B was previously new Condition BB; this is revised to be new Condition CC as shown on revised INSERT 26 for page 3.3-24a. Condition CC also provides the new note associated with the TS End States amendments regarding the nonapplicability of Limiting Condition of Operation (LCO) 3.0.4a when entering MODE 4. The new retyped (clean) TS pages 3.3-19, 3.3-24a, and 3.3-24b are contained in Attachment 2 to the Enclosure.
- TS 3.3.2 Condition C (page 3.3-19a): The TS End States amendments changed Required Action C.2.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to D and deleted this Required Action, and provided a separate Condition to address plant shutdown. A new proposed markup to the revised page 3.3-19a is provided. The default shutdown action for Condition D was previously new Condition BB; this is revised to be new Condition CC as shown on revised INSERT 26 for page 3.3-24a. Condition CC also provides the new note associated with the TS End States amendments regarding the nonapplicability of LCO 3.0.4a when entering MODE 4. The new retyped (clean) TS page 3.3-19a is contained in Attachment 2 to the Enclosure.
- TS 3.5.4 Condition C (page 3.5-7): The TS End States amendments changed Required Action C.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 did not impact this Condition. A new proposed markup to the revised page 3.5-7 is provided. The new retyped (clean) TS page 3.5-7 is contained in Attachment 2 to the Enclosure.
- TS 3.6.6 Condition B (page 3.6-13): The TS End States amendments changed Required Action B.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 did not impact this Condition. A new proposed markup to the revised page 3.6-13 is provided. The new retyped (clean) TS page 3.6-13 is contained in Attachment 2 to the Enclosure.

- TS 3.6.6 Condition E (page 3.6-14): The TS End States amendments changed Required Action E.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to F, and applied the associated Required Actions when a new Condition E is not met. To implement TSTF-505, the TS 3.6.6 structure is being revised as follows: (1) Condition E is being assigned as the default Condition (Condition F in TSTF-505 LAR 13-02) when the existing Conditions C or D and associated Completion Time is not met; (2) new Condition F (contained in INSERT 30), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is administratively changed from Condition F in TSTF-505 LAR 13-02; (3) a new Condition G (contained in INSERT 30) is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition F and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. A new proposed markup to the revised page 3.6-14 is provided, and a new INSERT 30 is provided for new Condition G in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.6-14 and 3.6-14a are contained in Attachment 2 to the Enclosure.
- TS 3.7.7 Condition B (page 3.7-14): The TS End States amendments changed Required Action B.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to C, and applied the associated Required Actions when a new Condition B is not met. To implement TSTF-505, the TS 3.7.7 structure is being revised as follows: (1) Condition B is being assigned as the default Condition when the existing Condition A and associated Completion Time is not met; (2) new Condition C (contained in INSERT 33), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is added; (3) a new Condition D (contained in INSERT 33) is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition C and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. A new proposed markup to the revised page 3.7-14 is provided, and a revised INSERT 33 is provided for new Conditions C and D in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.7-14 and 3.7-15 are contained in Attachment 2 to the Enclosure.

TS 3.7.8 Condition B (page 3.7-16): The TS End States amendments changed Required Action B.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to C, and applied the associated Required Actions when a new Condition B is not met. To implement TSTF-505, the TS 3.7.8 structure is being revised as follows: (1) Condition B is being assigned as the default Condition when the existing Condition A and associated Completion Time is not met; (2) new Condition C (contained in INSERT 34), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is added; (3) a new Condition D (contained in INSERT 34) is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition C and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. A new proposed markup to the revised page 3.7-16 is provided, and a revised INSERT 34 is provided for new Conditions C and D in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.7-16 and 3.7-16a are contained in Attachment 2 to the Enclosure.

TS 3.8.1 Condition H (page 3.8-3): The TS End States amendments changed Required Action H.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to J, and applied the associated Required Actions when either one of two new Conditions H or I is not met. To implement TSTF-505, the TS 3.8.1 structure is being revised as follows: (1) Condition H is being assigned as the default Condition when any of the existing Conditions A - G and associated Completion Time is not met; (2) new Conditions I and J (markup page 3.8-3a, contained in revised INSERT 35), which address emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," are added; (3) a new Condition K (contained in INSERT 35) is proposed to implement the TSTF-505 MODE 5 shutdown when either of the new Conditions I or J and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. New proposed markups to the revised pages 3.8-3 and 3.8-3a are provided, and a revised INSERT 35 is provided for new Conditions I, J, and K in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.8-3, 3.8-3a, and 3.8-3b are contained in Attachment 2 to the Enclosure.

- TS 3.8.4 Condition E (page 3.8-18a and page 3.8-19): The TS End States amendments changed Required Action E.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to F, and applied the associated Required Actions when a new Condition E is not met. To implement TSTF-505, the TS 3.8.4 structure is being revised as follows: (1) Condition E is being assigned as the default Condition when any of the existing Conditions A - D and associated Completion Time are not met; (2) new Condition F (contained in INSERT 36), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is added; (3) a new Condition G (contained in INSERT 36) is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition F and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. Note that the TS End States amendments also moved Condition E to the subsequent page. New proposed markups to the revised pages 3.8-18a and 3.8-19 are provided, and a revised INSERT 36 is provided for new Conditions F and G in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.8-18a, 3.8-19, and 3.8-19a are contained in Attachment 2 to the Enclosure.
- TS 3.8.7 Condition B (page 3.8-26): The TS End States amendments changed Required Action B.2 and its associated Completion Time to implement a MODE 4 End State. The TSTF-505 LAR 13-02 renumbered this Condition to C, and applied the associated Required Actions when a new Condition B is not met. To implement TSTF-505, the TS 3.8.7 structure is being revised as follows: (1) Condition B is being assigned as the default Condition when the existing Condition A and associated Completion Time is not met; (2) new Condition C (contained in INSERT 37), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is added; (3) a new Condition D is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition C and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, whichs represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. A new proposed markup to the revised page 3.8-26 is provided, and a revised INSERT 37 is provided for new Conditions C and D in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.8-26 and 3.8-26a are contained in Attachment 2 to the Enclosure.
- TS 3.8.9 Condition D (page 3.8-29): The TS End States amendments changed Required Action D.2 and its associated Completion Time to

implement a MODE 4 End State. The TSTF-505 LAR 13-02, in a supplemental submittal to respond to an NRC request for additional information in PG&E Letter DCL-15-007, "Response to NRC Request for Additional Information Regarding License Amendment Request 13-02, "Revision to Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, 'Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B,'" dated February 5, 2015, renumbered this Condition to Condition E, and applied the associated Required Actions when a new Condition D is not met. To implement TSTF-505, the TS 3.8.9 structure is being revised as follows: (1) Condition D is being assigned as the default Condition when any of the existing Conditions A - C and associated Completion Time are not met; (2) new Condition E (contained in INSERT 39), which addresses emergent conditions that represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more trains are considered "PRA functional," is added; (3) a new Condition F (contained in INSERT 39) is proposed to implement the TSTF-505 MODE 5 shutdown when new Condition E and its associated Completion Time is not met. This assures that the risk-informed MODE 4 End State is not applied to emergent conditions, which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE. A new proposed markup to the revised page 3.8-29 is provided, and a revised INSERT 39 is provided for new Conditions E and F in Attachment 1 to the Enclosure. The new retyped (clean) TS pages 3.8-29 and 3.8-30 are contained in Attachment 2 to the Enclosure.

The changes to the TS markups are contained in Attachment 1 to the Enclosure and changed to the retyped (clean) TS pages are contained in Attachment 2 to the Enclosure.

Editorial TS Changes

- TS 3.3.2 Table 3.3.2-1 (page 3.3-29): The LAR 13-02 for TSTF-505 inadvertently changed the nominal setpoint for Item 4.c from 22 pounds per square inch gage (psig) to 2.3 psig on TS page 3.3-29. This change was not intended to be part of the proposed changes. A new retyped TS page 3.3-29 is provided, which shows the current 22 psig nominal setpoint.
- TS 3.3.2 Table 3.3.2-1 (page 3.3-30): The LAR 13-02 for TSTF-505 inadvertently changed footnote designator "(c)" to "I" in three locations. This change was not intended to be part of the proposed changes. A new retyped page 3.3-30 is provided which shows the current footnote designator "(c)".

The changes to the retyped (clean) TS pages are contained in Attachment 2 to the Enclosure.

TS Bases Changes

As noted above, the TS End States amendments resulted in restructuring of several TS associated with TSTF-505 LAR 13-02. This resulted in revisions to several TS Bases pages submitted for information in the TSTF-505 LAR.

- TS 3.3.2 Actions B.2.2 and C.2.2: These Actions were revised by the TS End States amendments. The TSTF-505 LAR 13-02 changed Condition C to Condition D, and relocated Actions B.2.1, B.2.2, C.2.1, and C.2.2 to new default Condition BB. These Actions are now default Condition BB (for Condition C) and Condition CC (for Condition D). A revised INSERT B-26 is provided in Attachment 3 to the Enclosure.
- TS 3.6.6 Action E.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted a new Condition E and renumbered Condition E to Condition F. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition E and providing new Conditions F and G. A revised TS Bases page and revised INSERT B-30 are provided in Attachment 3 to the Enclosure.
- TS 3.7.7 Action B.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted a new Condition B and renumbered Condition B to Condition C. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition B and providing new Conditions C and D. A revised TS Bases page and revised INSERT B-33 are provided in Attachment 3 to the Enclosure.
- TS 3.7.8 Action B.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted a new Condition B and renumbered Condition B to Condition C. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition B and providing new Conditions C and D. A revised TS Bases page and revised INSERT B-34 are provided in Attachment 3 to the Enclosure.
- TS 3.8.1 Action H.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted new Conditions H and I, and renumbered Condition H to Condition J. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition H and providing new Conditions I, J, and K. A revised TS Bases page and revised INSERT B-35 are provided in Attachment 3 to the Enclosure.

- TS 3.8.4 Action E.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted a new Condition E and renumbered Condition E to Condition F. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition E and providing new Conditions F and G. A revised TS Bases page and revised INSERT B-36 are provided in Attachment 3 to the Enclosure.
- TS 3.8.7 Action B.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously inserted a new Condition B and renumbered Condition B to Condition C. This TS has been restructured to accommodate the TS End States amendments changes by retaining Condition B and providing new Conditions C and D. A revised TS Bases page and revised INSERT B-37 are provided in Attachment 3 to the Enclosure.
- TS 3.8.9 Action D.2 was revised by the TS End States amendments. The TSTF-505 LAR 13-02 had previously deleted Condition E that applied to two inoperable distribution subsystems that results in a loss of safety function. This TS has been restructured to accommodate the TS End States amendments changes by providing new Conditions E and F. A revised TS Bases page and revised INSERT B-40 are provided in Attachment 3 to the Enclosure.

Enclosure
Attachment 1
PG&E Letter DCL-16-104

Proposed Technical Specification Changes

3.3 INSTRUMENTATION

3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

LCO 3.3.2 The ESFAS instrumentation for each Function in Table 3.3.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2-1.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.2-1 for the channel(s) or train(s).	Immediately
B. One channel or train inoperable.	B.1 Restore channel or train to OPERABLE status.	48 hours
	<u>OR</u> B.2.1 Be in MODE 3.	54 hours
	<u>AND</u> B.2.2 NOTE LCO 3.0.4.a is not applicable when entering MODE 4. Be in MODE 4.	60 hours

INSERT 2

INSERT 16

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
CD. One train inoperable.	-----NOTE----- One train may be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE. -----	
	CD.1 Restore train to OPERABLE status.	24 hours
	<u>OR</u>	
	C.2.1 Be in MODE 3. <u>AND</u>	30 hours
	C.2.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	36 hours

INSERT 2

INSERT 17

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.4 Refueling Water Storage Tank (RWST)

LCO 3.5.4 The RWST shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4

ACTIONS

INSERT 2

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RWST boron concentration not within limits. <u>OR</u> RWST borated water temperature not within limits.	A.1 Restore RWST to OPERABLE status.	8 hours
B. RWST inoperable for reasons other than Condition A.	B.1 Restore RWST to OPERABLE status.	1 hour
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. <u>AND</u>	6 hours
	C.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 The containment fan cooling unit (CFCU) system and two containment spray trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

INSERT 2

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	72 hours
	<u>OR</u> A.2 Restore containment spray train to OPERABLE status	14 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2. -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours
		54 hours
C. One required The CFCU system inoperable such that a minimum of two CFCUs remain OPERABLE.	C.1 Restore required the CFCU system to OPERABLE status.	7 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One required containment spray train inoperable and one required the CFCU system inoperable such that a minimum of two CFCUs remain OPERABLE.	D.1 Restore one required containment spray system train to OPERABLE status,	72 hours
	<u>OR</u> D.2 Restore one the CFCU system to OPERABLE status such that four CFCUs or three CFCUs, each supplied by a different vital bus, are OPERABLE.	72 hours
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Be in MODE 3.	6 hours
	<u>AND</u> E.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours
F. Two containment spray trains inoperable. <u>OR</u> One containment spray train inoperable and two CFCU systems inoperable such that one or less CFCUs remain OPERABLE. <u>OR</u> One or less CFCUs OPERABLE.	F.1 Enter LCO 3.0.3.	Immediately

INSERT 30

INSERT 2

3.7 PLANT SYSTEMS

3.7.7 Vital Component Cooling Water (CCW) System

LCO 3.7.7 Two vital CCW loops shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One vital CCW loop inoperable.	<p>A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by CCW.</p> <p>Restore vital CCW loop to OPERABLE status.</p>	<p>72 hours</p>
B. Required Action and associated Completion Time of Condition A not met.	<p>B.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>B.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4.</p> <p>Be in MODE 4.</p>	<p>6 hours</p> <p>12 hours</p>

INSERT 2

INSERT 33

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.7.1 -----NOTE----- Isolation of CCW flow to individual components does not render the CCW System inoperable</p> <p>Verify each CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

(continued)

3.7 PLANT SYSTEMS

3.7.8 Auxiliary Saltwater (ASW) System

LCO 3.7.8 Two ASW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One ASW train inoperable.	A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by ASW. ----- Restore ASW train to OPERABLE status	72 hours
	B.1 Be in MODE 3. <u>AND</u> B.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours 12 hours

INSERT 2

INSERT 34

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two required offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required features.
	<u>AND</u> C.2 Restore one required offsite circuit to OPERABLE status.	24 hours
D. One required offsite circuit inoperable. <u>AND</u> One DG inoperable.	D.1 Restore required offsite circuit to OPERABLE status.	12 hours
	<u>OR</u> D.2 Restore DG to OPERABLE status.	12 hours
E. Two or more DGs inoperable.	E.1 Ensure at least two DGs are OPERABLE.	2 hours
F. One supply train of the DFO transfer system inoperable.	F.1 Restore the DFO transfer system to OPERABLE status.	72 hours
G. Two supply trains of the DFO transfer system inoperable.	G.1 Restore one train of the DFO transfer system to OPERABLE status.	1 hour
H. Required Action and associated Completion Time of Condition A, B, C, D, E, F or G not met.	H.1 Be in MODE 3.	6 hours
	<u>AND</u> H.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours

INSERT 2

(continued)

ACTIONS (continued)

INSERT 35	CONDITION	REQUIRED ACTION	COMPLETION TIME
→	I. Two or more DGs inoperable. <u>AND</u> One or more required offsite circuits inoperable.	I.1 Enter LCO 3.0.3.	Immediately
	J. One or more DGs inoperable. <u>AND</u> Two required offsite circuits inoperable.	J.1 Enter LCO 3.0.3.	Immediately

91

INSERT 2

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One battery inoperable.	B.1 Restore battery to OPERABLE status.	2 hours
	<u>OR</u>	
	B.2.1.1 NOTE Required Actions B.2.1.1, B.2.1.2, and B.2.2 are applicable, on a one time basis, for Unit 1 cycle 14.	
	Determine OPERABLE batteries are not inoperable due to common cause failure.	2 hours
	<u>OR</u>	
C. One DC electrical power subsystem inoperable for reasons other than Condition A or B.	B.2.1.2 Perform SR 3.8.4.1 and SR 3.8.6.1 for OPERABLE batteries.	2 hours
	<u>AND</u>	
	B.2.2 Restore battery to OPERABLE status.	4 hours
C. One DC electrical power subsystem inoperable for reasons other than Condition A or B.	C.1 Restore DC electrical power subsystem to OPERABLE status.	2 hours
D. More than one full capacity charger receiving power simultaneously from a single 480 V vital bus.	D.1 Restore the DC electrical power subsystem to a configuration wherein each charger is powered from its associated 480 volt vital bus.	14 days

(continued)

ACTIONS (continued)

E. Required Action and Associated Completion Time of Condition A, B, C, or D not met.	E.1 Be in MODE 3. <u>AND</u>	6 hours
	E.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours

INSERT 36

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is greater than or equal to the minimum established float voltage.	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.2	Verify each battery charger supplies ≥ 400 amps at greater than or equal to the minimum established float voltage for ≥ 4 hours. <u>OR</u> Verify each battery charger can recharge the battery to the fully charged state within 12 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state.	In accordance with the Surveillance Frequency Control Program
SR 3.8.4.3	-----NOTES----- 1. The modified performance discharge test in SR 3.8.6.6 may be performed in lieu of SR 3.8.4.3. 2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. ----- Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Inverters-Operating

LCO 3.8.7 Four Class 1E Vital 120 V UPS inverters shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required inverter inoperable.	<p>A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating" with any vital 120 V AC bus de-energized.</p> <p>Restore inverter to OPERABLE status.</p>	<p>24 hours</p>
B. Required Action and associated Completion Time of Condition A not met.	<p>B.1 Be in MODE 3.</p> <p>AND</p> <p>B.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4.</p> <p>Be in MODE 4.</p>	<p>6 hours</p> <p>12 hours</p>

INSERT 2

INSERT 37

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.7.1 Verify correct inverter voltage and alignment to required AC vital buses.	In accordance with the Surveillance Frequency Control Program

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems-Operating

LCO 3.8.9 The required Class 1E AC, DC, and 120 VAC vital bus electrical power distribution subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

INSERT 2

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One AC electrical power distribution subsystem inoperable.	A.1 Restore AC electrical power distribution subsystem to OPERABLE status.	8 hours
B. One 120 VAC vital bus subsystem inoperable.	B.1 Restore 120 VAC vital bus subsystem to OPERABLE status.	2 hours
C. One DC electrical power distribution subsystem inoperable.	C.1 Restore DC electrical power distribution subsystem to OPERABLE status.	2 hours
D. Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours 12 hours
E. Two required Class 1E AC, DC, or 120 VAC vital buses with inoperable distribution subsystems that result in a loss of safety function.	E.1 Enter LCO 3.0.3.	Immediately

INSERT 39

INSERT 2 (NOTE this INSERT is unchanged from DCL-13-106 Attachment 1)

OR

In accordance with
the Risk Informed
Completion Time
Program

INSERT 16 (NOTE this INSERT is unchanged from DCL-13-106 Attachment 1)

C. ----- NOTE ----- Not applicable when second channel or train intentionally made inoperable. ----- Two channels or trains inoperable.	C.1 Restore at least one channel or train to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
---	---	--

INSERT 17 (NOTE this INSERT is unchanged from DCL-13-106 Attachment 1)

E. ----- NOTE ----- Not applicable when second train intentionally made inoperable. ----- Two trains inoperable.	E.1 Restore at least one train to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
---	--	--

INSERT 26

<p>AA.----- NOTE -----</p> <p>Not applicable when two or more channels intentionally made inoperable.</p> <p>-----</p> <p>Two or more channels inoperable.</p>	<p>AA.1 Restore channels to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>BB. Required Action and associated Completion Time of Conditions C, E, S, T, X, Y, Z, or AA not met.</p>	<p>BB.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>BB.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>
<p>CC. Required Action and associated Completion Time of Conditions B, D, F, G, H, I, J, K, L, U, or V not met.</p>	<p>CC.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>CC.2 -----NOTE-----</p> <p>LCO 3.0.4a is not applicable when entering MODE 4.</p> <p>-----</p> <p>Be in MODE 4.</p>	<p>6 hours</p> <p>12 hours</p>
<p>DD. Required Action and associated Completion Time of Conditions M, N, Q, or R not met.</p>	<p>DD.1 Be in MODE 3.</p>	<p>6 hours</p>
<p>EE. Required Action and associated Completion Time of Conditions O or P not met.</p>	<p>EE.1 Be in MODE 2.</p>	<p>6 hours</p>

INSERT 30

<p>F. ----- NOTE -----</p> <p>Not applicable when second containment spray train or fourth CFCU intentionally made inoperable.</p> <p>-----</p> <p>Two containment spray trains inoperable.</p> <p><u>OR</u></p> <p>One containment spray train inoperable and the CFCU system inoperable such that one or less CFCUs remain OPERABLE.</p> <p><u>OR</u></p> <p>The CFCU system inoperable such that one or less CFCUs remain OPERABLE.</p>	<p>F.1 Restore containment spray trains and the CFCU system to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>G. Required Action and associated Completion Time of Condition F not met.</p>	<p>G.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>G.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 33

<p>C. ----- NOTE -----</p> <p>Not applicable when second vital CCW loop intentionally made inoperable.</p> <p>-----</p> <p>Two vital CCW loops inoperable.</p>	<p>C.1 Restore vital CCW loops to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be is MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 34

<p>C. ----- NOTE -----</p> <p>Not applicable when second ASW train intentionally made inoperable.</p> <p>-----</p> <p>Two ASW trains inoperable.</p>	<p>C.1 Restore ASW trains to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 35

<p>I. ----- NOTE -----</p> <p>Not applicable when offsite circuit or second DG intentionally made inoperable.</p> <p>-----</p> <p>Two or more DGs inoperable.</p> <p><u>AND</u></p> <p>One or more required offsite circuits inoperable.</p>	<p>I.1 Restore required AC sources to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>J. ----- NOTE -----</p> <p>Not applicable when DG or second offsite circuit intentionally made inoperable.</p> <p>-----</p> <p>One or more DGs inoperable.</p> <p><u>AND</u></p> <p>Two required offsite circuits inoperable.</p>	<p>J.1 Restore required AC sources to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>K. Required Action and associated Completion Time of Condition I or J not met.</p>	<p>K.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>K.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 36

<p>F. ----- NOTE -----</p> <p>Not applicable when second DC electrical power subsystem intentionally made inoperable.</p> <p>-----</p> <p>Two or more DC electrical power subsystems inoperable.</p>	<p>F.1 Restore DC electrical power subsystems to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>G. Required Action and associated Completion Time of Condition F not met.</p>	<p>G.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>G.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 37

<p>C. ----- NOTE -----</p> <p>Not applicable when two or more required inverters intentionally made inoperable.</p> <p>-----</p> <p>Two or more required inverters inoperable.</p>	<p>C.1 Restore inverters to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

INSERT 38

5.5.20 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09, Revision 0-A, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;
- b. A RICT may only be utilized in MODE 1 and 2;
- c. When a RICT is being used, any plant configuration change within the scope of the Risk Informed Completion Time Program must be considered for the effect on the RICT.
 - 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
 - 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
 - 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. Use of a RICT is not permitted for voluntary entry into a configuration which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE.
- e. Use of a RICT, not to exceed 24 hours, is permitted for emergent conditions which represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more of the trains are considered "PRA functional" as defined in Section 2.3.1 of NEI 06-09.

INSERT 39

<p>E. ----- NOTE -----</p> <p>Not applicable when two or more electrical power distribution subsystems intentionally made inoperable.</p> <p>-----</p> <p>Two or more electrical power distribution subsystems inoperable.</p>	<p>E.1 Restore electrical power distribution subsystems to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>F. Required Action and associated Completion Time of Condition E not met.</p>	<p>F.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>F.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

Revised Technical Specification Pages

(Note: pages changed in this letter are identified below by a revision bar and the revised pages are contained in Attachment 2)

<u>Remove Page</u>	<u>Insert Page</u>
1.3-10	1.3-10
	1.3-11
	1.3-12
3.3-1	3.3-1
	3.3-1a
3.3-2	3.3-2
3.3-3	3.3-3
3.3-3a	3.3-3a
3.3-4	3.3-4
3.3-4a	3.3-4a
	3.3-4b
3.3-5	3.3-5
	3.3-5a
3.3-6	3.3-6
3.3-7	3.3-7
3.3-12	3.3-12
3.3-13	3.3-13
3.3-14	3.3-14
3.3-15	3.3-15
3.3-16	3.3-16
3.3-19	3.3-19
	3.3-19a
3.3-20	3.3-20
3.3-20a	3.3-20a
3.3-21	3.3-21
3.3-22	3.3-22
	3.3-22a
3.3-23	3.3-23
3.3-24	3.3-24
3.3-24a	3.3-24a
	3.3-24b
3.3-27	3.3-27
3.3-28	3.3-28
3.3-29	3.3-29
3.3-30	3.3-30
3.3-31	3.3-31
3.3-32	3.3-32
3.3-33	3.3-33
3.4-16	3.4-16
	3.4-16a

Revised Technical Specification Pages (continued)

<u>Remove Page</u>	<u>Insert Page</u>
3.4-18	3.4-18
	3.4-18a
3.4-19	3.4-19
3.4-20	3.4-20
3.4-21	3.4-21
3.5-1	3.5-1
	3.5-1a
3.5-3	3.5-3
3.5-7	3.5-7
	3.5-7a
3.6-4	3.6-4
3.6-5	3.6-5
3.6-6	3.6-6
3.6-7	3.6-7
3.6-8	3.6-8
3.6-13	3.6-13
3.6-14	3.6-14
	3.6-14a
3.7-4	3.7-4
3.7-8	3.7-8
3.7-10	3.7-10
3.7-11	3.7-11
3.7-13	3.7-13
3.7-14	3.7-14
3.7-15	3.7-15
3.7-16	3.7-16
	3.7-16a
3.8-1	3.8-1
3.8-2	3.8-2
3.8-3	3.8-3
	3.8-3a
	3.8-3b
3.8-16	3.8-16
3.8-18	3.8-18
3.8-18a	3.8-18a
	3.8-19
	3.8-19a
3.8-26	3.8-26
	3.8-26a
3.8-29	3.8-29

Revised Technical Specification Pages (continued)

Remove Page

3.8-30
5.0-17a

Insert Page

3.8-30 |
5.0-17a
5.0-17b |

3.3 INSTRUMENTATION

3.3.2 Engineered Safety Feature Actuation System (ESFAS) Instrumentation

LCO 3.3.2 The ESFAS instrumentation for each Function in Table 3.3.2-1 shall be OPERABLE.

APPLICABILITY: According to Table 3.3.2-1.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels or trains inoperable.	A.1 Enter the Condition referenced in Table 3.3.2-1 for the channel(s) or train(s).	Immediately
B. One channel or train inoperable.	B.1 Restore channel or train to OPERABLE status.	48 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. ----- NOTE ----- Not applicable when second channel or train intentionally made inoperable. ----- Two channels or trains inoperable.	C.1 Restore at least one channel or train to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One train inoperable.	<p>-----NOTE-----</p> <p>One train may be bypassed for up to 4 hours for surveillance testing provided the other train is OPERABLE.</p> <p>-----</p> <p>D.1 Restore train to OPERABLE status.</p>	<p>24 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>E. ----- NOTE -----</p> <p>Not applicable when second train intentionally made inoperable.</p> <p>-----</p> <p>Two trains inoperable.</p>	<p>E.1 Restore at least one train to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
Z. One channel inoperable.	<p>-----NOTE----- The inoperable channel and one additional channel may be surveillance tested in bypass for up to 12 hours only if any function 1.c channel associated with the inoperable channel is in trip. This note is not intended to allow simultaneous testing of coincident channels on a routine basis. -----</p> <p>Z.1 Place channel in bypass.</p>	72 hours
<p>AA. ----- NOTE ----- Not applicable when two or more channels intentionally made inoperable. ----- Two or more channels inoperable.</p>	AA.1 Restore channels to OPERABLE status.	<p>1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program</p>
BB. Required Action and associated Completion Time of Conditions C, E, S, T, X, Y, Z, or AA not met.	<p>BB.1 Be in MODE 3. <u>AND</u> BB.2 Be in MODE 5.</p>	<p>6 hours 36 hours</p>
CC. Required Action and associated Completion Time of Conditions B, D, F, G, H, I, J, K, L, U, or V not met.	<p>CC.1 Be in MODE 3. <u>AND</u> CC.2 -----NOTE----- LCO 3.0.4a is not applicable when entering MODE 4. ----- Be in MODE 4.</p>	<p>6 hours 12 hours</p>
DD. Required Action and associated Completion Time of Conditions M, N, Q, or R not met.	DD.1 Be in MODE 3.	6 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
EE. Required Action and associated Completion Time of Conditions O or P not met.	EE.1 Be in MODE 2.	6 hours

Table 3.3.2-1 (page 3 of 7)
Engineered Safety feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL ^(a) TRIP SETPOINT
3. Containment Isolation (continued)						
b. Phase B Isolation						
(1) Manual Initiation	1,2,3,4	2 per train	B, C	SR 3.3.2.8	NA	NA
(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	2 trains	D, E	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
(3) Contain- ment Pressure High-High	1,2,3,4	4	Z, AA	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9	≤ 22.12 psig	22 psig
4. Steam Line Isolation						
a. Manual Initiation	1,2 ⁽ⁱ⁾ ,3 ⁽ⁱ⁾	1/valve	W	SR 3.3.2.8	NA	NA
b. Automatic Actuation Logic and Actuation Relays	1,2 ⁽ⁱ⁾ ,3 ⁽ⁱ⁾	2 trains	K, L	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA
c. Containment Pressure- High –High	1,2 ⁽ⁱ⁾ ,3 ⁽ⁱ⁾	4	H, I	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≤ 22.12 psig	22.0 psig

(continued)

- (a) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.
- (i) Except when all MSIVs are closed and de-activated.

Table 3.3.2-1 (page 4 of 7)
Engineered Safety feature Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE	NOMINAL TRIP SETPOINT ^(a)
4. Steam Line Isolation (continued)						
d. Steam Line Pressure						
(1) Low	1,2 ⁽ⁱ⁾ , 3 ^{(b)(i)}	3 per steam line	F, G	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≥ 597.6 ^(c) psig	600 ^(c) psig
(2) Negative Rate-High	3 ^{(g)(i)}	3 per steam line	F	SR 3.3.2.1 SR 3.3.2.5 SR 3.3.2.9 SR 3.3.2.10	≤ 102.4 ^(h) psi/sec	100 ^(h) psi/sec
e. Not used.						
f. Not used						
g. Not used						
h. Not used						
5. Feedwater Isolation						
a. Automatic Actuation Logic and Actuation Relays	1,2 ^(j)	2 trains	M, N	SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.6	NA	NA

(continued)

- (a) A channel is OPERABLE with an actual Trip Setpoint value outside its calibration tolerance band provided the Trip Setpoint value is conservative with respect to its associated Allowable Value and the channel is re-adjusted to within the established calibration tolerance band of the Nominal Trip Setpoint. A Trip Setpoint may be set more conservative than the Nominal Trip Setpoint as necessary in response to plant conditions.
- (b) Above the P-11 (Pressurizer Pressure) interlock and below the P-11 interlock unless the Function is blocked.
- (c) Time constants used in the lead/lag compensator are $t_1 = 50$ seconds and $t_2 = 5$ seconds
- (g) Below the P-11 (Pressurizer Pressure). However, may be blocked below P-11 when Safety Injection on Steam Line Pressure-Low is not blocked.
- (h) Time constant utilized in the rate/lag compensator are $t_3 = 50$ sec and $t_4 = 50$ sec.
- (i) Except when all MSIVs are closed and de-activated.
- (j) Except when all MFIVs, MFRVs, and associated bypass valves are closed and de-activated or isolated by a closed manual valve.

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS)

3.5.4 Refueling Water Storage Tank (RWST)

LCO 3.5.4 The RWST shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RWST boron concentration not within limits. <u>OR</u> RWST borated water temperature not within limits.	A.1 Restore RWST to OPERABLE status.	8 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. RWST inoperable for reasons other than Condition A.	B.1 Restore RWST to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. <u>AND</u> C.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours 12 hours

3.6 CONTAINMENT SYSTEMS

3.6.6 Containment Spray and Cooling Systems

LCO 3.6.6 The containment fan cooling unit (CFCU) system and two containment spray trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One containment spray train inoperable.	A.1 Restore containment spray train to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3. <u>AND</u> B.2. -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours 54 hours
C. The CFCU system inoperable such that a minimum of two CFCUs remain OPERABLE.	C.1 Restore the CFCU system to OPERABLE status.	7 days <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One containment spray train inoperable and the CFCU system inoperable such that a minimum of two CFCUs remain OPERABLE.	D.1 Restore containment spray train to OPERABLE status, <u>OR</u>	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
	D.2 Restore the CFCU system to OPERABLE status such that four CFCUs or three CFCUs, each supplied by a different vital bus, are OPERABLE.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Be in MODE 3. <u>AND</u>	6 hours
	E.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>F. ----- NOTE ----- Not applicable when second containment spray train or fourth CFCU intentionally made inoperable. -----</p> <p>Two containment spray trains inoperable.</p> <p><u>OR</u></p> <p>One containment spray train inoperable and the CFCU system inoperable such that one or less CFCUs remain OPERABLE.</p> <p><u>OR</u></p> <p>The CFCU system inoperable such that one or less CFCUs remain OPERABLE.</p>	<p>F.1 Restore containment spray trains and the CFCU system to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
<p>G. Required Action and associated Completion Time of Condition F not met.</p>	<p>G.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>G.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

3.7 PLANT SYSTEMS

3.7.7 Vital Component Cooling Water (CCW) System

LCO 3.7.7 Two vital CCW loops shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

[illegible]

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Not applicable when second vital CCW loop intentionally made inoperable. ----- Two vital CCW loops inoperable.</p>	<p>C.1 Restore vital CCW loops to OPERABLE status.</p>	<p>1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 5.</p>	<p>6 hours 36 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.7.1 -----NOTE----- Isolation of CCW flow to individual components does not render the CCW System inoperable ----- Verify each CCW manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.7.7.2 Verify each CCW automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.7.7.3 Verify each CCW pump starts automatically on an actual or simulated actuation signal.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

3.7 PLANT SYSTEMS

3.7.8 Auxiliary Saltwater (ASW) System

LCO 3.7.8 Two ASW trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One ASW train inoperable.	<p>A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by ASW. ----- Restore ASW train to OPERABLE status</p>	<p>72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program</p>
B. Required Action and associated Completion Time of Condition A not met.	<p>B.1 Be in MODE 3. <u>AND</u> B.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.</p>	<p>6 hours 12 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. -----NOTE----- Not applicable when second ASW train intentionally made inoperable. ----- Two ASW trains inoperable.	C.1 Restore ASW trains to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 5.	6 hours 36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.8.1 Verify each ASW manual and power operated, valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.	In accordance with the Surveillance Frequency Control Program
SR 3.7.8.2 Verify each ASW power operated valve in the flow path that is not locked, sealed, or otherwise secured in position, can be moved to the correct position.	In accordance with the Inservice Test Program.
SR 3.7.8.3 Verify each ASW pump starts automatically on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two required offsite circuits inoperable.	C.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable.	12 hours from discovery of Condition C concurrent with inoperability of redundant required features.
	<u>AND</u> C.2 Restore one required offsite circuit to OPERABLE status.	24 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. One required offsite circuit inoperable. <u>AND</u> One DG inoperable.	D.1 Restore required offsite circuit to OPERABLE status.	12 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
	<u>OR</u> D.2 Restore DG to OPERABLE status.	12 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
E. Two or more DGs inoperable.	E.1 Ensure at least two DGs are OPERABLE.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
F. One supply train of the DFO transfer system inoperable.	F.1 Restore the DFO transfer system to OPERABLE status.	72 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
G. Two supply trains of the DFO transfer system inoperable.	G.1 Restore one train of the DFO transfer system to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
H. Required Action and associated Completion Time of Condition A, B, C, D, E, F or G not met.	H.1 Be in MODE 3. <u>AND</u> H.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	6 hours 12 hours
I. ----- NOTE ----- Not applicable when offsite circuit or second DG intentionally made inoperable. ----- Two or more DGs inoperable. <u>AND</u> One or more required offsite circuits inoperable.	I.1 Restore required AC sources to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>J. ----- NOTE ----- Not applicable when DG or second offsite circuit intentionally made inoperable. ----- One or more DGs inoperable. <u>AND</u> Two required offsite circuits inoperable.</p>	<p>J.1 Restore required AC sources to OPERABLE status.</p>	<p>1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program</p>
<p>K. Required Action and associated Completion Time of Condition I or J not met.</p>	<p>K.1 Be in MODE 3. <u>AND</u> K.2 Be in MODE 5.</p>	<p>6 hours 36 hours</p>

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One battery inoperable.	B.1 Restore battery to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. One DC electrical power subsystem inoperable for reasons other than Condition A or B.	C.1 Restore DC electrical power subsystem to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
D. More than one full capacity charger receiving power simultaneously from a single 480 V vital bus.	D.1 Restore the DC electrical power subsystem to a configuration wherein each charger is powered from its associated 480 volt vital bus.	14 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and Associated Completion Time of Condition A, B, C, or D not met.	E.1 Be in MODE 3. <u>AND</u>	6 hours
	E.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours
F. ----- NOTE ----- Not applicable when second DC electrical power subsystem intentionally made inoperable. ----- Two or more DC electrical power subsystems inoperable.	F.1 Restore DC electrical power subsystems to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
G. Required Action and associated Completion Time of Condition F not met.	G.1 Be in MODE 3. <u>AND</u>	6 hours
	G.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.4.1 Verify battery terminal voltage is greater than or equal to the minimum established float voltage.	In accordance with the Surveillance Frequency Control Program

(continued)

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4.2 Verify each battery charger supplies ≥ 400 amps at greater than or equal to the minimum established float voltage for ≥ 4 hours.</p> <p><u>OR</u></p> <p>Verify each battery charger can recharge the battery to the fully charged state within 12 hours while supplying the largest combined demands of the various continuous steady state loads, after a battery discharge to the bounding design basis event discharge state.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.8.4.3 -----NOTES-----</p> <ol style="list-style-type: none"> 1. The modified performance discharge test in SR 3.8.6.6 may be performed in lieu of SR 3.8.4.3. 2. This Surveillance shall not be performed in MODE 1, 2, 3, or 4. <p>-----</p> <p>Verify battery capacity is adequate to supply, and maintain in OPERABLE status, the required emergency loads for the design duty cycle when subjected to a battery service test.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.7 Inverters-Operating

LCO 3.8.7 Four Class 1E Vital 120 V UPS inverters shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required inverter inoperable.	<p>A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating" with any vital 120 V AC bus de-energized. ----- Restore inverter to OPERABLE status.</p>	<p>24 hours</p> <p><u>OR</u></p> <p>In accordance with the Risk Informed Completion Time Program</p>
B. Required Action and associated Completion Time of Condition A not met.	<p>B.1 Be in MODE 3. <u>AND</u></p> <p>B.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.</p>	<p>6 hours</p> <p>12 hours</p>

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. ----- NOTE ----- Not applicable when two or more required inverters intentionally made inoperable. ----- Two or more required inverters inoperable.</p>	<p>C.1. Restore inverters to OPERABLE status.</p>	<p>1 hour</p> <p><u>OR</u> In accordance with the Risk Informed Completion Time Program</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be in MODE 3.</p> <p><u>AND</u></p> <p>D.2 Be in MODE 5.</p>	<p>6 hours</p> <p>36 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.7.1 Verify correct inverter voltage and alignment to required AC vital buses.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems-Operating

LCO 3.8.9 The required Class 1E AC, DC, and 120 VAC vital bus electrical power distribution subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One AC electrical power distribution subsystem inoperable.	A.1 Restore AC electrical power distribution subsystem to OPERABLE status.	8 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
B. One 120 VAC vital bus subsystem inoperable.	B.1 Restore 120 VAC vital bus subsystem to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program
C. One DC electrical power distribution subsystem inoperable.	C.1 Restore DC electrical power distribution subsystem to OPERABLE status.	2 hours <u>OR</u> In accordance with the Risk Informed Completion Time Program

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A, B, or C not met.	D.1 Be in MODE 3. <u>AND</u>	6 hours
	D.2 -----NOTE----- LCO 3.0.4.a is not applicable when entering MODE 4. ----- Be in MODE 4.	12 hours
E. ----- NOTE ----- Not applicable when two or more electrical power distribution subsystems intentionally made inoperable. ----- Two or more electrical power distribution subsystems inoperable.	E.1. Restore electrical power distribution subsystems to OPERABLE status.	1 hour <u>OR</u> In accordance with the Risk Informed Completion Time Program
F. Required Action and associated Completion Time of Condition E not met.	F.1 Be in MODE 3. <u>AND</u>	6 hours
	F.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.9.1	Verify correct breaker alignments and voltage to required AC, DC, and 120 VAC vital bus electrical power distribution subsystems.	In accordance with the Surveillance Frequency Control Program

5.5 Programs and Manuals (continued)

5.5.20 Risk Informed Completion Time Program

This program provides controls to calculate a Risk Informed Completion Time (RICT) and must be implemented in accordance with NEI 06-09, Revision 0-A, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;
 - b. A RICT may only be utilized in MODE 1 AND 2.
 - c. When a RICT is being used, any plant configuration change within the scope of the Risk Informed Completion Time Program must be considered for the effect on the RICT.
 - 1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
 - 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
 - 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
 - d. Use of a RICT is not permitted for voluntary entry into a configuration which represents a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE.
 - e. Use of a RICT, not to exceed 24 hours, is permitted for emergent conditions which represent a loss of a specified safety function or inoperability of all required trains of a system required to be OPERABLE if one or more of the trains are considered "PRA functional" as defined in Section 2.3.1 of NEI 06-09.
-

**Technical Specification Bases Changes
(For information only)**

BASES

ACTIONS

E.1 and E.2 (continued)

Required Action E.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

INSERT B-30

E.1

~~With two containment spray trains or one containment spray train inoperable and two CFCU systems inoperable such that one or less CFCUs remain OPERABLE or one or less CFCUs are OPERABLE, the unit is in a condition outside the accident analysis. Therefore, LCO 3.0.3 must be entered immediately.~~

(continued)

BASES

ACTIONS
(continued)

B.1 and B.2

If the PG&E Design Class I CCW loop cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which overall plant risk is reduced. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 4 within 12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 4). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 4, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action B.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

INSERT B-33



The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

(continued)

BASES

ACTIONS
(continued)

INSERT B-34



B.1 and B.2 (continued)

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.8.1

Verifying the correct alignment for manual and power operated valves in the ASW system flow path provides assurance that the proper flow paths exist for ASW system operation. The ASW system flow path consists of the direct flow path servicing the PG&E Design Class I equipment (e.g., CCW heat exchanger) and portions of any branch line flow path off the direct flow path that a valve misposition could result in degradation of the system safety function. This SR does not apply to valves that are locked, sealed, or otherwise secured in position, since they are verified to be in the correct position prior to being locked, sealed, or secured. This SR also does not apply to valves which are closed and secured by a cap or blind flange (e.g., manual test, vent, and drain valves), to valves that cannot be inadvertently misaligned (e.g., check valves), or to valves in instrument or sample lines. This SR does not require any testing or valve manipulation; rather, it involves verification that those valves capable of being mispositioned are in the correct position. This SR does not apply to valves that cannot be inadvertently misaligned, such as check valves.

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

(continued)

BASES

ACTIONS

G.1 (continued)

INSERT B-2

be less than that associated with an immediate controlled shutdown (the immediate shutdown could cause grid instability, which could result in a total loss of AC power). Since any inadvertent generator trip could also result in a total loss of offsite AC power, the time allowed for ~~continued operation~~ is severely restricted. The intent here is to avoid the risk associated with an ~~immediate controlled shutdown~~ and to minimize the risk associated with this level of degradation.➔

H.1 and H.2

If the inoperable AC electric power sources cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which overall plant risk is reduced. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 26). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 26, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action H.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

INSERT B-35

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS
(continued)

E.1 and E.2

If the inoperable DC electrical power subsystem cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which overall plant risk is reduced. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 12). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 12, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action E.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

INSERT B-36

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS

A.1 (continued)

AC electrical power sources (offsite and onsite). The uninterruptible inverter source to the 120-Vac Class 1E buses is the preferred source for powering instrumentation trip setpoint devices.

B.1 and B.2

If the inoperable devices or components cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which overall plant risk is reduced. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours.

Remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 4). In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 4, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action B.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

INSERT B-37

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES

ACTIONS
(continued)

INSERT B-40

E.1

Condition E corresponds to two required Class 1E AC, DC, or 120-Vac buses with inoperable distribution subsystems that result in a loss of safety function, adequate core cooling, containment OPERABILITY and other PG&E Design Class I functions for DBA mitigation would be compromised, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

SURVEILLANCE
REQUIREMENTS

SR 3.8.9.1

This Surveillance verifies that the required Class 1E AC, DC, and 120-Vac bus electrical power distribution systems are functioning properly, with the correct circuit breaker alignment. The correct breaker alignment ensures the appropriate separation and independence of the electrical divisions is maintained, and the appropriate voltage is available to each required bus. The verification of proper voltage availability on the buses ensures that the required voltage is readily available for motive as well as control functions for critical system loads connected to these buses. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

Table B 3.8.9-1

The table on the next page defines the general features of the AC and DC Electrical Power Distribution System.

REFERENCES

1. UFSAR, Chapter 6.
 2. UFSAR, Chapter 15.
 3. NUREG-1151, "Technical Specifications Diablo Canyon Nuclear Power Plant, Units 1 and 2," August 1985. (TS Bases 3/4.8.1, 3/4.8.2, 3/4.8.3).
 4. WCAP-16294-NP-A, Rev. 1, "Risk-Informed Evaluation of Changes to Technical Specification Required Action Endstates for Westinghouse NSSS PWRs," June 2010.
-

Note this INSERT is unchanged from DCL-13-106.

INSERT B-2

Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

INSERT B-26

AA.1

With two or more channels inoperable the Required Action is to restore sufficient inoperable channels to OPERABLE status to reduce total inoperable channels to one within 1 hour. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of sufficient channels. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when two or more channels are intentionally made inoperable. The Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one channel is inoperable for any reason and the additional channels are found to be inoperable, or if two or more channels are found to be inoperable at the same time.

BB.1 and BB.2

If the Required Action and associated Completion Time of Condition C, E, S, T, X, Y, Z, or AA is not met, the unit must be placed in MODE 3 within 6 hours and MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 5, these Functions are no longer required OPERABLE.

CC.1 and CC.2

If the Required Action and associated Completion Time of Condition B, D, F, G, H, I, J, K, L, U, or V is not met, the unit must be placed in MODE 3 within 6 hours and MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems. In MODE 4, these Functions are either no longer required OPERABLE, or remaining within the Applicability of the LCO is acceptable to accomplish short duration repairs to restore inoperable equipment because the plant risk in MODE 4 is similar to or lower than MODE 5 (Ref. 20).

In MODE 4 the Steam Generators and Residual Heat Removal System are available to remove decay heat, which provides diversity and defense in depth. As stated in Reference 20, the steam turbine driven Auxiliary Feedwater Pump must be available to remain in MODE 4. Should Steam Generator cooling be lost while relying on this Required Action, there are preplanned actions to ensure long-term decay heat removal. Voluntary entry into MODE 5 may be made as it is also acceptable from a risk perspective.

Required Action CC.2 is modified by a Note that states that LCO 3.0.4.a is not applicable when entering MODE 4. This Note prohibits the use of LCO 3.0.4.a to enter MODE 4 during startup with the LCO not met. However, there is no restriction on the use of LCO 3.0.4.b, if applicable, because LCO 3.0.4.b requires performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of

entering MODE 4, and establishment of risk management actions, if appropriate. LCO 3.0.4 is not applicable to, and the Note does not preclude, 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.

DD.1

If the Required Action and associated Completion Time of Condition M, N, Q, or R is not met, the unit must be placed in MODE 3 within 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 3 from full power conditions in an orderly manner and without challenging unit systems. In MODE 3, these Functions are no longer required OPERABLE.

EE.1

If the Required Action and associated Completion Time of Condition O or P is not met, the unit must be placed in MODE 2 within 6 hours. The allowed Completion Time of 6 hours is reasonable, based on operating experience, to reach MODE 2 from full power conditions in an orderly manner and without challenging unit systems. In MODE 2, these Functions are no longer required OPERABLE.

INSERT B-30

F.1

With two containment spray trains inoperable, or one containment spray train inoperable and the CFCU System inoperable such that one or less CFCUs remain OPERABLE, or one or less CFCUs are OPERABLE, sufficient containment spray trains and/or CFCUs must be restored to OPERABLE status so that no more than one containment spray train is inoperable and two CFCUs are OPERABLE within one hour or in accordance with the Risk Informed Completion Time Program. The allowed Completion Time provides a short time to restore the trains to OPERABLE, before proceeding with a plant shutdown required by Condition G.

The Condition is modified by a Note stating it is not applicable when two containment spray trains or four CFCUs are intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one containment spray train or a combination of one containment spray train and CFCUs are inoperable for any reason and a second containment spray train or additional CFCUs are found to be inoperable at the same time.

G.1 and G.2

If the Required Action and associated Completion Time of Condition F of this LCO is not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

INSERT B-33

C.1

With two PG&E Design Class I CCW loops inoperable the Required Action is to restore the inoperable the PG&E Design Class I CCW loops to OPERABLE status within 1 hour to regain a heat sink for safety related components. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of at least one vital CCW loop. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when the second vital CCW loop is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one vital CCW loop is inoperable for any reason and a second vital CCW loop is found to be inoperable, or if two vital CCW loops are found to be inoperable at the same time.

D.1 and D.2

If the PG&E Design Class I CCW loops cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

INSERT B-34

C.1

With two ASW trains inoperable, the Required Action is to restore the inoperable ASW trains to OPERABLE status within 1 hour to regain a heat sink for safety related components. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of at least one train. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when the second ASW train is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one ASW train is inoperable for any reason and a second ASW train is found to be inoperable, or if two ASW trains are found to be inoperable at the same time.

D.1 and D.2

If the ASW trains cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

INSERT B-35

I.1

With two or more DGs and one or more required offsite circuits inoperable, the Required Action is to restore enough of the required inoperable AC sources to OPERABLE status within 1 hour to regain some level of redundancy in the AC electrical power supplies. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of sufficient AC electrical power supplies. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when an offsite circuit or second DG is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one required offsite circuit and DG are inoperable for any reason and additional DGs are found to be inoperable, or if two DGs are inoperable and one or more required offsite circuits are found to be inoperable at the same time.

J.1

With two or more required offsite circuits and one or more DGs inoperable, the Required Action is to restore enough of the required inoperable AC sources to OPERABLE status within 1 hour to regain some level of redundancy in the AC electrical power supplies. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of sufficient AC electrical power supplies. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when a DG or second offsite circuit is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one required offsite circuit and DG are inoperable for any reason and additional offsite circuits are found to be inoperable, or if two required offsite circuits are inoperable and one or more DGs are found to be inoperable at the same time.

K.1 and K.2

If the inoperable AC electric power sources cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

INSERT B-36

F.1

With two or more DC electrical power subsystems inoperable, the Required Action is to restore sufficient DC electrical power subsystems to OPERABLE status within 1 hour to regain control power for the AC emergency power system. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of at least one DC electrical power subsystem. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when the second DC electrical power subsystem is intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one DC electrical power subsystem is inoperable for any reason and a second DC electrical power subsystem is found to be inoperable, or if two DC electrical power subsystem are found to be inoperable at the same time.

G.1 and G.2

If the inoperable DC electrical power subsystems cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems. The Completion Time to bring the unit to MODE 5 is consistent with the time required in Regulatory Guide 1.93 (Ref. 7).

INSERT B-37

C.1

With two or more required inverters inoperable the Required Action is to restore sufficient inverters to OPERABLE status within 1 hour to regain AC electrical power to the vital buses. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of at least one [required] inverter. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when two or more required inverters are intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one required inverter is inoperable for any reason and additional required inverters are found to be inoperable, or if two or more required inverters are found to be inoperable at the same time.

D.1 and D.2

If the inoperable devices or components cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

INSERT B-40

With two or more electrical power distribution subsystems inoperable that result in a loss of safety function, the Required Action is to restore sufficient electrical power distribution subsystems within 1 hour to restore safety function. The 1 hour Completion Time is acceptable because it minimizes risk while allowing time for restoration of sufficient electrical power distribution subsystems. Alternately, a Completion Time can be determined in accordance with the Risk Informed Completion Time Program.

The Condition is modified by a Note stating it is not applicable when two or more required inverters are intentionally made inoperable. This Required Action is not intended for voluntary removal of redundant systems or components from service. The Required Action is only applicable if one electrical power distribution subsystem is inoperable for any reason and a second electrical power distribution subsystem is found to be inoperable, or if two or more electrical power distribution subsystems are found to be inoperable at the same time.

F.1 and F.2

If the inoperable distribution subsystem(s) cannot be restored to OPERABLE status within the required Completion Time, the unit must be brought to a MODE in which the LCO does not apply. To achieve this status, the unit must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging plant systems.

Revision to Regulatory Commitments

The regulatory commitment contained in Attachment 4 of the Enclosure of PG&E Letter DCL-15-007, Response to NRC RAI on License Amendment Request (LAR) 13-02, Revision to Technical Specifications to Adopt Risk Informed Completion Times TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times – RITSTF Initiative 4B," dated February 5, 2015, is listed below. The commitment contained administrative controls that would be taken at a time beyond 24 hours. The DCL-15-007 commitment needs to be revised to remove the administrative controls (Plant Manager approval and NRC resident inspector notification) that would be performed beyond 24 hours because they are no longer required due to the change to TS Section 5 proposed in this letter that limits the use of a RICT to 24 hours for an emergent condition where Probabilistic Risk Assessment (PRA) functionality exists. Therefore, the DCL-15-007 commitment is revised below to reflect the changes made to Technical Specification (TS) Section 5 in this letter.

Original DCL-15-007 commitment

The plant-specific procedure implementing the RICT Program will specifically address situations where TS 5.5.20.e is utilized for an emergent condition that PRA functionality exists but neither train by itself is PRA functional. The following administrative controls will be established to assure limited plant operation, management authorization, and NRC awareness:

The RICT Program should not be used to extend operation to the limit of 30 days specified by TS 5.5.20.a when all safety trains are inoperable, and restoration of the Limiting Condition of Operation (LCO) cannot be accomplished by maintaining PRA Functionality in at least one train as required by TS 5.5.20.e.

In the event of such a configuration, the RICT may be used to provide additional time only for the purpose of preparing for an orderly plant shutdown considering the status of plant equipment required to implement and maintain shutdown conditions, including consideration of external plant conditions potentially affecting safe unit operations during transition and shutdown modes.

The Plant Manager shall approve within 72 hours continued operation using a RICT in this configuration.

The NRC resident inspector shall be notified within 72 hours of continued operation using a RICT in this configuration.

Revised commitment

The plant-specific procedure implementing the RICT Program will specifically address situations where TS 5.5.20.e is utilized for an emergent condition that PRA functionality exists but neither train by itself is PRA functional. The following administrative control will be established to assure limited plant operation:

In the event of such a configuration, the RICT may be used to provide additional time only for the purpose of preparing for an orderly plant shutdown considering the status of plant equipment required to implement and maintain shutdown conditions, including consideration of external plant conditions potentially affecting safe unit operations during transition and shutdown modes.