

ATTACHMENT 1 TO AEP:NRG:1036C
REASONS AND 10 CFR 50.92 ANALYSIS FOR
CHANGES TO THE DONALD G. COOK NUCLEAR PLANT
TECHNICAL SPECIFICATIONS

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In Generic Letter 87-09, the NRC noted a problem with unnecessary shutdowns caused by inadvertent surpassing of surveillance intervals. The generic letter stated:

"Some Action Requirements have allowable outage time limits of only one or two hours and do not establish a practical time limit for the completion of a missed Surveillance Requirement. If surveillances cannot be completed within these time limits, a plant shutdown would usually be required. Even if the Action Requirements include remedial measures that would permit continued operation, they may be stated in such a way that they could prevent the performance of the required surveillance. A plant shutdown would also be required if the missed surveillance applies to more than the minimum number of systems or components required to be operable for operation under the allowable outage time limits of the Action Requirements. In this case, the individual specification or Specification 3.0.3 would require a shutdown.

If a plant shutdown is required before a missed surveillance is completed, it is likely that it would be conducted when the plant is being shut down because completion of a missed surveillance would terminate the shutdown requirement. This is undesirable since it increases the risk to the plant and public safety for two reasons. First, the plant would be in a transient state involving changing plant conditions that offer the potential for an upset that could lead to a demand for the system or component being tested. This would occur when the system or component is either out of service to allow performance of the surveillance test or there is a lower level of confidence in its operability because the normal surveillance interval was exceeded. If the surveillance did demonstrate that the system or component was inoperable, it usually would be preferable to restore it to operable status before making a major change in plant operating conditions. Second, a shutdown would increase the pressure on the plant staff to expeditiously complete the required surveillance so that the plant could be returned to power operation. This would further increase the potential for a plant upset when both the shutdown and surveillance activities place a demand on the plant operators."

The following is excerpted from the NRC staff position provided in Generic Letter 87-09.

"It is overly conservative to assume that systems and components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has

not been verified by the performance of the required surveillance. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff has concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this time limit or when shutdown Action Requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

Although a missed surveillance would generally be completed in less time than this 24-hour limit allows, special circumstances may require additional time to ensure that the surveillance can be conducted in a safe manner. The time limits of Action Requirements for surveillances should start when it is identified that Surveillance Requirements have not been performed, except when the 24-hour delay is allowed in the implementation of the Action Requirements. Where the 24-hour time limit is allowed, the time limits of the Action Requirements are applicable either at the end of the 24-hour limit if the surveillance has not been completed or at the time the surveillance is performed if the system or component is found to be inoperable."

We are proposing to modify our Technical Specification 4.0.3 to indicate that action requirements may be delayed for up to 24 hours to permit the completion of a missed surveillance when the allowable outage time limits of the action requirements are less than 24 hours.

10 CFR 50.92 Criteria

Per 10 CFR 50.92, a proposed amendment will not involve a significant hazards consideration if the proposed amendment does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously analyzed,
- 2) Create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated, or
- 3) Involve a significant reduction in a margin of safety.

Criterion 1

As discussed in Generic Letter 87-09, it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The NRC staff has concluded that 24 hours is an acceptable time limit for completing a missed surveillance. The NRC has determined that a 24-hour time limit balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. It is therefore concluded that the change does not involve a significant increase in the probability or consequences of an accident previously analyzed.

Criterion 2

The change involves no physical modifications to the plant, introduces no new operating configurations, nor results in changes to the design basis. It is therefore concluded that the change does not create the possibility of a new or different kind of accident from any accident previously analyzed or evaluated.

Criterion 3

As discussed in Generic Letter 87-09, it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The NRC staff has concluded that 24 hours is an acceptable time limit for completing a missed surveillance. The NRC has determined that a 24-hour time limit balances the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with action requirements before the surveillance can be completed. It is therefore concluded that the change does not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the determination of significant hazards by providing examples (48 FR 14870) of amendments considered not likely to involve significant hazards consideration. The sixth example refers to changes that may result in some increase to the probability or consequences of a previously analyzed accident, but the results of which are within clearly established acceptance limits. This change is consistent with guidance provided to licensees in Generic Letter 87-09. We therefore conclude that the example cited is relevant and that the change does not involve significant hazards consideration.

ATTACHMENT 2 TO AEP:NRC:1036C
PROPOSED REVISED TECHNICAL SPECIFICATION PAGES

3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

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

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. In the event a Surveillance Requirement is missed, the time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. However, the ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. When the 24-hour delay is applied, the time limits of the ACTION Requirements are applicable either at the end of the 24-hour time limit if the surveillance has not been completed, or at the time the system or component is determined to be inoperable as a result of the surveillance. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

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

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice tests of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

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ATTACHMENT 3 TO AEP:NRC:1036C

MARKED-UP TECHNICAL SPECIFICATION PAGES

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