

BRUNSWICK STEAM ELECTRIC PLANT, UNITS 1 & 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62

REQUEST FOR LICENSE AMENDMENT
REMOVAL OF 3.25 LIMIT ON EXTENDING SURVEILLANCE INTERVALS
(PROPOSED TECHNICAL SPECIFICATION PAGES)

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APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL CONDITIONS or other states 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 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. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable state shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable 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. During the time period:

1. From issuance of the Facility Operating License to the start of facility commercial operation, inservice testing 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, 1974 Edition, and Addenda through Winter 1975 except where specific written relief has been granted by the commission.
2. Following start of facility commercial operation, inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with 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).

APPLICABILITY

BASES

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS are provided in the individual Surveillance Requirements.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillance that are not performed during refueling outages.

The tolerance value is sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

4.0.3 The provisions of the specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems, or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems, or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

4.0.4 This specification ensures that surveillance activities associated with a Limiting Condition for Operation have been performed within the specified time interval prior to entry into an applicable CONDITION. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outage, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status. Exceptions to some surveillance activities have been provided for an individual specifications.

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1. From issuance of the Facility Operating License to the start of facility commercial operation, inservice testing 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, 1974 Edition, and Addenda through Winter 1975 except where specific written relief has been granted by the commission.
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4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS are provided in the individual Surveillance Requirements.

4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillance that are not performed during refueling outages.

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