

ENCLOSURE 3

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
NRC DOCKET NOS. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR-62  
SUPPLEMENT TO REQUEST FOR LICENSE AMENDMENTS  
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

TYPED TECHNICAL SPECIFICATION PAGES - UNIT 1

9704080257 970331  
PDR ADOCK 05000324  
P PDR

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

---

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation unless otherwise stated in the Surveillance Requirement. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the Limiting Condition for Operation except as provided in Surveillance Requirement 3.0.3.

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 If it is discovered that a Surveillance requirement was not performed within its specified time interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of the discovery, up to 24 hours or up to the period of the specified time interval, whichever is less. The delay period is permitted to allow performance of the Surveillance Requirement.

If the Surveillance requirement is not performed within the delay period, the Limiting Condition For Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.

When the Surveillance Requirement is performed within the delay period and the Surveillance requirement is not met, the Limiting Condition For Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.

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. 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 Surveillance Requirement 4.0.1 establishes the requirement that Surveillance Requirements must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirements. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with Surveillance Requirement 4.0.2, constitutes a failure to meet a Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE when the associated Surveillance Requirements have been met. Surveillances do not have to be performed when the unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified.

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 This specification establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified time interval. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Surveillance Requirement 4.0.2, and not at the time that the specified time interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

## APPLICABILITY

### BASES

---

#### 4.0.3 (Continued)

When a Surveillance with a time interval based upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Surveillance Requirement 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Specification 4.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by ACTION requirements.

Failure to comply with specified time intervals for Surveillance Requirements is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Requirement 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the completion times of the ACTION requirements for the applicable Limiting Condition for Operation conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the completion times of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the completion time of the ACTION requirements, restores compliance with Surveillance Requirement 4.0.1.

This specification incorporates the guidance provided in Generic Letter 87-09.

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.

## APPLICABILITY

### BASES

---

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50, Section 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these technical specifications.

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

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

This specification includes a statement that the Inservice Inspection Program for pipe covered by the scope of GL 88-01 will be in conformance with the staff positions on schedule, methods and personnel, and sample expansion included in GL 88-01. This requirement may be removed from the technical specifications in the future in line with the Technical Specification Improvement Programs.

ENCLOSURE 4

BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2  
NRC DOCKET NOS. 50-325 AND 50-324  
OPERATING LICENSE NOS. DPR-71 AND DPR-62  
SUPPLEMENT TO REQUEST FOR LICENSE AMENDMENTS  
APPLICABILITY AND SURVEILLANCE REQUIREMENTS

TYPED TECHNICAL SPECIFICATION PAGES - UNIT 2

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

---

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation unless otherwise stated in the Surveillance Requirement. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the Limiting Condition for Operation except as provided in Surveillance Requirement 3.0.3

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 If it is discovered that a Surveillance Requirement was not performed within its specified time interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of the discovery, up to 24 hours or up to the period of the specified time interval, whichever is less. The delay period is permitted to allow performance of the Surveillance Requirement.

If the Surveillance Requirement is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.

When the Surveillance Requirement is performed within the delay period and the Surveillance Requirement is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.

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. 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 Surveillance Requirement 4.0.1 establishes the requirement that Surveillance Requirements must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirements. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with Surveillance Requirement 4.0.2, constitutes a failure to meet a Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE when the associated Surveillance Requirements have been met. Surveillances do not have to be performed when the unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified.

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 This specification establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified time interval. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Surveillance Requirement 4.0.2, and not at the time that the specified time interval was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with ACTION requirements or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

## APPLICABILITY

### BASES

#### 4.0.3 (Continued)

When a Surveillance with a time interval based upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Surveillance Requirement 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Specification 4.0.3 also provides a time limit for completion of Surveillance that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by ACTION requirements.

Failure to comply with specified time intervals for Surveillance Requirements is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Requirement 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the completion times of the ACTION requirements for the applicable Limiting Condition for Operation Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the completion times of the ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the completion time of the ACTION requirements, restores compliance with Surveillance Requirement 4.0.1.

This specification incorporates the guidance provided in Generic Letter 87-09.

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 start-up 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 in individual specifications.

## APPLICABILITY

### BASES

---

4.0.5 This specification ensures that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50, Section 50.55a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these technical specifications.

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

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

This specification includes a statement that the Inservice Inspection Program for pipe covered by the scope of GL 88-01 will be in conformance with the staff positions on schedule, methods and personnel, and sample expansion included in GL 88-01. This requirement may be removed from the technical specifications in the future in line with the Technical Specification Improvement Programs.