



10 CFR 50.90

LR-N20-0042
LAR S19-03

June 18, 2020

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

Salem Generating Station
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Subject: **Supplement to License Amendment Request: Revise Minimum Required Channels, Mode Applicability and Actions for the Source Range and Intermediate Range Neutron Flux Reactor Trip System Instrumentation Technical Specifications**

- References:
1. PSEG letter to NRC, "License Amendment Request: Revise Minimum Required Channels, Mode Applicability and Actions for the Source Range and Intermediate Range Neutron Flux Reactor Trip System Instrumentation Technical Specifications," dated October 23, 2019 (ADAMS Accession No. ML19296B108)
 2. PSEG letter to NRC, "Supplement to License Amendment Request: Revise Minimum Required Channels, Mode Applicability and Actions for the Source Range and Intermediate Range Neutron Flux Reactor Trip System Instrumentation Technical Specifications," dated May 11, 2020 (ADAMS Accession No. ML20133K108)

In the Reference 1 letter, PSEG Nuclear LLC (PSEG) submitted a license amendment request (LAR) to Renewed Facility Operating License Nos. DPR-70 and DPR-75 for Salem Generating Station Units 1 and 2 respectively. The proposed amendment would revise Technical Specification (TS) 3/4.3.1, "Reactor Trip System Instrumentation"; specifically the Limiting Condition for Operation (LCO) and Actions for TS 3.3.1.1, Table 3.3-1 associated with the Intermediate Range (IR) and Source Range (SR) neutron flux channels, Table 3.3-1 Functional Units 5 and 6 respectively.

The subject LAR proposed to revise the modes of applicability for the SR and IR instrumentation to address conditions of SR and IR inoperability that currently require entry into TS 3.0.3. The proposed changes also better align the TS with NUREG-1431 (Westinghouse Standard Improved Technical Specifications) as well as reflect the overall design basis of the SR and IR instrument systems.

In the Reference 2 letter, PSEG submitted a supplement to the Reference 1 LAR proposing changes to TS Table 4.3-1, "Reactor Trip System Instrumentation Surveillance Requirements," to align the surveillance requirements for the SR and IR instruments with the proposed LCO modes of applicability.

In this letter, PSEG proposes additional changes consistent with Revision 4 of NUREG-1431 to provide a delay in the requirement to perform the SR CHANNEL FUNCTIONAL TEST after entering the MODE of Applicability for this surveillance under specified conditions.

The following additional changes to the TS are proposed to add a four hour allowance to perform the required surveillance for the SR channels when reducing power in MODE 2 below the P-6 setpoint, and when entering MODE 3 from MODE 2 with the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.

TS Table 4.3-1: Reactor Trip System Instrumentation Surveillance Requirements

Functional Unit-6 – Source Range, Neutron Flux

- Revise Functional Unit 6A for SR instruments in Startup to add a new note (8) to Mode 2 in the 'CHANNEL FUNCTIONAL TEST' column of TS Table 4.3-1. The new note (8) provides a four hour allowance to perform the required Surveillance when power is reduced below the P-6 (Block of Source Range Reactor Trip) setpoint. The proposed change is aligned with the allowance provided for performance of the Surveillance in SR 3.3.1.8 of NUREG-1431. The Note allows a normal shutdown to be completed and the unit removed from the MODE of Applicability for this surveillance without a delay to perform the testing required by this surveillance.
- Revise Functional Unit 6C for SR instruments in Shutdown Modes 3, 4 and 5 with reactor trip breakers closed and the control rod drive system capable of rod withdrawal to add a new note (10) in the CHANNEL FUNCTIONAL TEST column of TS Table 4.3-1. The new note (10) provides a four hour allowance to perform the required Surveillance when entering MODE 3 from MODE 2. The proposed change is aligned with the allowance provided for performance of Surveillance SR 3.3.1.7 of NUREG-1431. The Note allows a normal shutdown to proceed without a delay for testing in MODE 2 and for a short time in MODE 3 until the reactor trip breakers are open

The four hour time allowance for performance of the required SR Surveillance allows adequate time to perform the required test and bring the SR channels into Surveillance and declared OPERABLE in the event the Surveillance has not been performed within the frequency specified in the Salem Surveillance Frequency Control Program (SFCP). The four hour allowance prevents the need to enter the associated Actions for inoperable SR channels and the operational impact that would result from those Actions. During the four hour time frame, the two Gamma Metrics wide range Post-Accident neutron monitors are available to provide core neutron flux monitoring. The Gamma Metrics channels have a range and sensitivity that extends below P-6 to shutdown level neutron count rates and are maintained OPERABLE in MODES 1, 2 and 3 per Salem TS Table 3.3-11.

Attachment 1 to this letter provides the proposed supplemental TS mark-up pages and Attachment 2 provides the revised camera-ready TS pages. The changes depicted in the TS markups provided in both the Reference 1 LAR submittal and Reference 2 Supplement remain unaffected by this supplement.

PSEG has determined that the information provided does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards determination previously submitted. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments contained in this letter.

If you have any questions or require additional information, please contact Mr. Michael Wiwel at 856-339-7907.

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

Executed on 6/18/2020
(Date)

Respectfully,



Charles V. McFeaters
Site Vice President
Salem Generating Station

Attachment 1: Mark-up of Proposed Technical Specification Pages
Attachment 2: Revised Camera-ready Technical Specification Pages

cc: Administrator, Region I, NRC
Mr. J. Kim, Project Manager, NRC
NRC Senior Resident Inspector, Salem
Mr. P. Mulligan, Chief, NJBNE
PSEG Corporate Commitment Tracking Coordinator
Salem Commitment Tracking Coordinator

Attachment 1**Mark-up of Proposed Technical Specification Pages**

The following Technical Specification page for Renewed Facility Operating License DPR-70 is affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
Table 4.3-1	3/4 3-11
Table 4.3-1	3/4 3-13

The following Technical Specification page for Renewed Facility Operating License DPR-75 is affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
Table 4.3-1	3/4 3-11
Table 4.3-1	3/4 3-13

TABLE 4.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK⁽¹⁵⁾</u>	<u>CHANNEL CALIBRATION⁽¹⁵⁾</u>	<u>CHANNEL FUNCTIONAL TEST⁽¹⁵⁾</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
1. Manual Reactor Trip Switch	N.A.	N.A.	(9)	1, 2, and *
2. Power Range, Neutron Flux		(2), (3) (6) (17)	(18)	1, 2, and 3*
3. Power Range, Neutron Flux, High Positive Rate	N.A.	(6)	(18)	1, 2
4. Deleted				
5. Intermediate Range, Neutron Flux		(6) #, ##	S/U ⁽¹⁾ #, ##	1, 2 and *
6. Source Range, Neutron Flux	(7) Replace with Insert	(6) #, ##	(16) and S/U⁽¹⁾ #, ##	2, 3, 4, 5 and *
7. Overtemperature ΔT				1, 2
8. Overpower ΔT				1, 2
9. Pressurizer Pressure--Low				1, 2
10. Pressurizer Pressure--High				1, 2
11. Pressurizer Water Level--High				1, 2
12. Loss of Flow - Single Loop				1

If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the nominal Trip Setpoint at the completion of the surveillance; otherwise the channel shall be declared inoperable. Setpoints more conservative than the nominal Trip Setpoint are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the surveillance procedures to confirm channel performance. The methodologies used to determine the as-found and as-left tolerances are specified in the Technical Specification Bases.

(a) Below the P-10 (Power Range Neutron Flux) interlocks
(b) Above the P-6 (Intermediate Range Neutron Flux) interlocks

If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours after reducing power below P-6.

TABLE 4.3-1 (Continued)

NOTATION

* With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.

(1) - If not performed in previous 31 days.

(2) - Heat balance only, above 15% of RATED THERMAL POWER.

(3) - Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Recalibrate if absolute difference ≥ 3 percent.

(4) - Manual SSPS functional input check in accordance with the Surveillance Frequency Control Program.

(5) - Each train or logic channel shall be tested in accordance with the Surveillance Frequency Control Program.

(6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.

(7) - Below P-6 (Block of Source Range Reactor Trip) setpoint.

(8) - ~~Deleted~~

(9) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Undervoltage and Shunt Trip mechanism for the Manual Reactor Trip Function.

The Test shall also verify OPERABILITY of the Bypass Breaker Trip circuits.

(10) - ~~DELETED~~

(11) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Reactor Trip Breaker Undervoltage and Shunt Trip mechanisms.

(12) - DELETED

(13) - Verify operation of Bypass Breakers Shunt Trip function from local pushbutton while breaker is in the test position prior to placing breaker in service.

(14) - Perform a functional test of the Bypass Breakers U.V. Attachment via the SSPS.

(15) - Frequencies are specified in the Surveillance Frequency Control Program unless otherwise noted in the table.

(16) - At the frequency specified in the Surveillance Frequency Control Program.

(17) - In MODES 1, and 2, the SSPS input relays are excluded from this Surveillance when the installed bypass test capability is used to perform this Surveillance.

(18) - The SSPS input relays are excluded from this Surveillance when the installed bypass test capability is used to perform this Surveillance.

If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours of entering MODE 3 from MODE 2.

TABLE 4.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK⁽¹⁵⁾</u>	<u>CHANNEL CALIBRATION⁽¹⁵⁾</u>	<u>CHANNEL FUNCTIONAL TEST⁽¹⁵⁾</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
1. Manual Reactor Trip Switch	N.A.	N.A.	(9)	1, 2, and *
2. Power Range, Neutron Flux		(2), (3) (6) (17)	(18)	1, 2, and 3*
3. Power Range, Neutron Flux, High Positive Rate	N.A.	(6)	(18)	1, 2
4. Deleted				
5. Intermediate Range, Neutron Flux		(6) #, ##	S/U ⁽¹⁾ #, ##	1, 2 and *
6. Source Range, Neutron Flux	(7)	(6) #, ##	(16) and S/U ⁽¹⁾ #, ##	2, 3, 4, 5 and *
7. Overtemperature ΔT				1, 2
8. Overpower ΔT				1, 2
9. Pressurizer Pressure--Low				1, 2
10. Pressurizer Pressure--High				1, 2
11. Pressurizer Water Level--High				1, 2
12. Loss of Flow - Single Loop				1

If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the nominal Trip Setpoint at the completion of the surveillance; otherwise the channel shall be declared inoperable. Setpoints more conservative than the nominal Trip Setpoint are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the surveillance procedures to confirm channel performance. The methodologies used to determine the as-found and as-left tolerances are specified in the Technical Specification Bases.

(a) Below the P-10 (Power Range Neutron Flux) interlocks
(b) Above the P-6 (Intermediate Range Neutron Flux) interlocks

TABLE 4.3-1 (Continued)

NOTATION

- * With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 31 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER.
- (3) - Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Recalibrate if absolute difference ≥ 3 percent.
- (4) - Manual SSPS functional input check in accordance with the Surveillance Frequency Control Program.
- (5) - Each train or logic channel shall be tested in accordance with the Surveillance Frequency Control Program.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-6 (Block of Source Range Reactor Trip) setpoint.

(8) - ~~Deleted~~

- (9) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Undervoltage and Shunt Trip mechanism for the Manual Reactor Trip Function.

The Test shall also verify OPERABILITY of the Bypass Breaker Trip circuits.

(10) - ~~DELETED~~

- (11) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Reactor Trip Breaker Undervoltage and Shunt Trip mechanisms.

(12) - DELETED

- (13) - Verify operation of Bypass Breakers Shunt Trip function from local pushbutton while breaker is in the test position prior to placing breaker in service.

(14) - Perform a functional test of the Bypass Breakers U.V. Attachment via the SSPS.

(15) Frequencies are specified in the Surveillance Frequency Control Program unless otherwise noted in the table.

(16) At the frequency specified in the Surveillance Frequency Control Program.

(17) - In MODES 1 and 2, the SSPS input relays are excluded from this Surveillance when the installed bypass test capability is used to perform this Surveillance.

(18) - The SSPS input relays are excluded from this Surveillance when the installed bypass test capability is used to perform this Surveillance.

INSERT

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK⁽¹⁵⁾</u>	<u>CHANNEL CALIBRATION⁽¹⁵⁾</u>	<u>CHANNEL FUNCTIONAL TEST⁽¹⁵⁾</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
6. Source Range, Neutron Flux				
A. Startup		(6), #, ##	(16), (8) and S/U ⁽¹⁾ #, ##	2 ⁽⁷⁾
B. Shutdown		(6)	N.A.	3, 4, 5
C. Shutdown		(6), #, ##	(10), #, ##	3 [*] , 4 [*] , 5 [*]

**Added by this
Supplement**

Attachment 2**Revised Camera-ready Technical Specification Pages**

The following Technical Specification page for Renewed Facility Operating License DPR-70 is affected by this change request:

Technical Specification**Page**

Table 4.3-1

3/4 3-11

Table 4.3-1

3/4 3-13

The following Technical Specification page for Renewed Facility Operating License DPR-75 is affected by this change request:

Technical Specification**Page**

Table 4.3-1

3/4 3-11

Table 4.3-1

3/4 3-13

TABLE 4.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK ⁽¹⁵⁾	CHANNEL CALIBRATION ⁽¹⁵⁾	CHANNEL FUNCTIONAL TEST ⁽¹⁵⁾	MODES IN WHICH SURVEILLANCE REQUIRED
1. Manual Reactor Trip Switch	N.A.	N.A.	(9)	1, 2, and *
2. Power Range, Neutron Flux		(2), (3) (6) (17)	(18)	1, 2, and 3*
3. Power Range, Neutron Flux, High Positive Rate	N.A.	(6)	(18)	1, 2
4. <u>Deleted</u>				
5. Intermediate Range, Neutron Flux		(6) #, ##	S/U ⁽¹⁾ #, ##	1 ^(a) , 2 ^(b)
6. Source Range, Neutron Flux				
A. Startup		(6) #, ##	(16),(8) and S/U ⁽¹⁾ #, ##	2 ⁽⁷⁾
B. Shutdown		(6)	N.A.	3, 4, 5
C. Shutdown		(6) #, ##	(10), #, ##	3*, 4*, 5*
7. Overtemperature ΔT				1, 2
8. Overpower ΔT				1, 2
9. Pressurizer Pressure--Low				1, 2
10. Pressurizer Pressure--High				1, 2
11. Pressurizer Water Level--High				1, 2
12. Loss of Flow - Single Loop				1

If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

The instrument channel setpoint shall be reset to a value that is within the as-left tolerance around the nominal Trip Setpoint at the completion of the surveillance; otherwise the channel shall be declared inoperable. Setpoints more conservative than the nominal Trip Setpoint are acceptable provided that the as-found and as-left tolerances apply to the actual setpoint implemented in the surveillance procedures to confirm channel performance. The methodologies used to determine the as-found and as-left tolerances are specified in the Technical Specification Bases.

(a) Below the P-10 (Power Range Neutron Flux) interlocks

(b) Above the P-6 (Intermediate Range Neutron Flux) interlocks

TABLE 4.3-1 (Continued)

NOTATION

- * With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 31 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER.
- (3) - Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Recalibrate if absolute difference ≥ 3 percent.
- (4) - Manual SSPS functional input check in accordance with the Surveillance Frequency Control Program.
- (5) - Each train or logic channel shall be tested in accordance with the Surveillance Frequency Control Program.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-6 (Block of Source Range Reactor Trip) setpoint.
- (8) - If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours after reducing power below P-6.
- (9) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Undervoltage and Shunt Trip mechanism for the Manual Reactor Trip Function.
- The Test shall also verify OPERABILITY of the Bypass Breaker Trip circuits.
- (10) - If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours of entering MODE 3 from MODE 2.
- (11) - The CHANNEL FUNCTIONAL TEST shall independently verify the OPERABILITY of the Reactor Trip Breaker Undervoltage and Shunt Trip mechanisms.
- (12) - DELETED
- (13) - Verify operation of Bypass Breakers Shunt Trip function from local pushbutton while breaker is in the test position prior to placing breaker in service.
- (14) - Perform a functional test of the Bypass Breakers U.V. Attachment via the SSPS.
- (15) - Frequencies are specified in the Surveillance Frequency Control Program unless otherwise noted in the table.
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3. Power Range, Neutron Flux, High Positive Rate	N.A.	(6)	(18)	1, 2
4. <u>Deleted</u>				
5. Intermediate Range, Neutron Flux		(6) #, ##	S/U ⁽¹⁾ #, ##	1 ^(a) , 2 ^(b)
6. Source Range, Neutron Flux				
A. Startup		(6) #, ##	(16), (8) and S/U ⁽¹⁾ #, ##	2 ⁽⁷⁾
B. Shutdown		(6)	N.A.	3, 4, 5
C. Shutdown		(6) #, ##	(10), #, ##	3*, 4*, 5*
7. Overtemperature ΔT				1, 2
8. Overpower ΔT				1, 2
9. Pressurizer Pressure--Low				1, 2
10. Pressurizer Pressure--High				1, 2
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12. Loss of Flow - Single Loop				1

If the as-found channel setpoint is outside its predefined as-found tolerance, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service.

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NOTATION

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- (7) - Below P-6 (Block of Source Range Reactor Trip) setpoint.
- (8) - If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours after reducing power below P-6.
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- (10) - If not performed within the frequency of the Surveillance Frequency Control Program, perform the CHANNEL FUNCTIONAL TEST within 4 hours of entering MODE 3 from MODE 2.
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