

NRC INSPECTION MANUAL

ILRB

PART 9900: TECHNICAL GUIDANCE

STS303.TG

STANDARD TECHNICAL SPECIFICATIONS SECTION 3.0.3 LIMITING CONDITIONS FOR OPERATION

A. PURPOSE

To provide guidance on Standard Technical Specifications (STS) Section 3.0.3 as it relates to limiting conditions for operation (LCO).

B. BACKGROUND

Regions III and V have reported the incorrect use of the provisions of STS Section 3.0.3 by licensees. As an example, Technical Specification 3.7.A.5.b for Dresden and Quad Cities, and similar specifications for other plants, establish the containment oxygen concentration requirements during the 24 hours prior to a shutdown, and after the reactor mode switch has been placed in the run position on startup. If the oxygen-allowable concentration exceeds the technical specification limit for more than 24 hours prior to shutdown or for more than 24 hours after the reactor mode switch has been placed in run position on startup, the plant is in violation of the LCO and should be shut down in accordance with the LCO. However, the licensee proposed to enter LCO 3.0.3 at the end of the 24-hour period and use the requirements of LCO 3.0.3 to have an additional 12 hours to shut down the plant. Technical Specification 3.7.A.5.b, defines the two conditions for which oxygen concentration can be exceeded. For either condition, an explicit 24-hour time limit for shutting down is provided. There are no other circumstances which are not accounted for, and STS 3.0.3 does not apply.

The basic information provided to Regions III and V concerning the use of STS 3.0.3 is discussed in the section below.

C. DISCUSSION

LCO as defined in STS 3.0.3 is not intended to be used as an operational convenience which permits redundant safety systems to be out of service for a limited period of time. Its intended purpose is to provide guidance on the time limits for an "orderly" shutdown when the individual LCO or ACTION statements in other specifications cannot be complied with. Voluntary entry into LCO

3.0.3 deliberately removes the last line of defense against potentially harmful events. Doing so allows removal of a system from service when the redundant system is already inoperable. An action like this would show a disregard for plant safety and is unacceptable. It also should be emphasized that removal of a system from service is justified only for test, maintenance, or repair purposes.

Generic Letter GL 87-09, "Sections 3.0 and 4.0 of the STS on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," was issued June 4, 1987, to clarify the bases and intent of STS 3.0.3 and should be referred to for additional information on this subject.

D. REFERENCES

The guidance provided in this directive was extracted from the following memoranda:

1. Memorandum from Thomas E. Murley, Director, Office of Nuclear Reactor Regulation, to Regional Administrators, dated June 17, 1987, subject: Intentional Entry Into Specification Limiting Condition For Operation 3.0.3 (Document Control System microfiche 68925/165).
2. Memorandum from Charles E. Rossi, Director, Division of Operational Events Assessment, NRR, to Regional Division Directors, DRP, dated July 24, 1987, subject: Use Of General Technical Specifications To Extend The Time Limits Of Specific Technical Specifications (Document Control System, microfiche 68962/185).

END