

January 19, 2000

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: **Docket Nos. 50-361 and 50-362**  
**Surveillance Requirement 3.0.3, Missed Surveillances**  
**Proposed Technical Specification Change NPF-10/15-512**  
**San Onofre Nuclear Generating Station, Units 2 and 3**

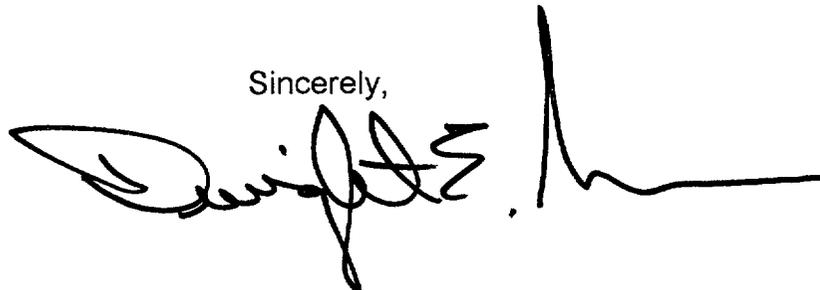
Gentlemen:

Enclosed are Amendment Application Numbers 196 and 181 to Facility Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3), respectively. The amendment applications consist of Proposed Change Number (PCN) 512. PCN-512 revises the allowable time to complete a missed surveillance test as specified in Surveillance Requirement (SR) 3.0.3 before declaring the affected Limiting Condition For Operation not met. The allowable time is increased from "up to 24 hours or up to the limit of the specified Frequency, whichever is less," to "up to 24 hours or up to the limit of the specified Frequency, whichever is greater." PCN-512 conforms to proposed change TSTF-358 of the industry Technical Specification Task Force, and is provided for NRC review in parallel with TSTF-358.

Southern California Edison (SCE) requests this amendment be effective when issued, to be fully implemented within 30 days of issuance.

If you would like additional information regarding this amendment application, please let me know.

Sincerely,



Enclosure

cc: E. W. Merschhoff, Regional Administrator, NRC Region IV  
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 and 3  
L. Raghavan, NRC Project Manager, San Onofre Units 2 and 3  
S. Y. Hsu, Department of Health Services, Radiologic Health Branch

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA )  
EDISON COMPANY, ET AL. for a class 103 )  
License to Acquire, Possess, and Use )  
a Utilization Facility as Part of )  
Unit No. 3 of the San Onofre Nuclear )  
Generating Station )

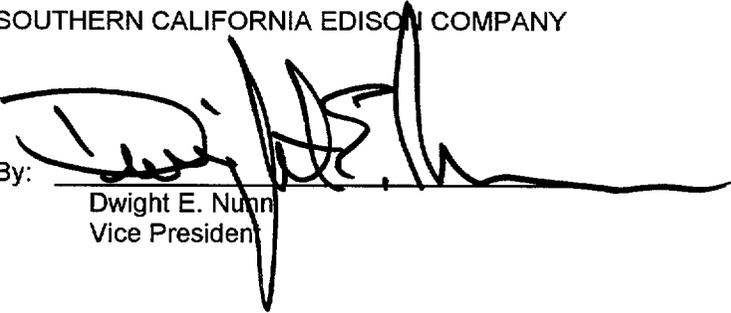
Docket No. 50-362  
Amendment Application  
No. 181

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit  
Amendment Application No. 181. This amendment application consists of Proposed Change  
No. PCN-512 to Facility Operating License NPF-15. PCN-512 is a request to revise Surveillance  
Requirement 3.0.3 to change the allowable time to perform a missed surveillance test.

Subscribed on this 19th day of January, 2000.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:   
Dwight E. Nunn  
Vice President

State of California  
County of San Diego

On 1/19/00 before me, Mariane Sanchez,

personally appeared Dwight E. Nunn, personally known to me ~~(or~~  
~~proved to me on the basis of satisfactory evidence)~~ to be the person whose name is subscribed to the within  
instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his  
signature on the instrument the person, or the entity upon behalf of which the person acted, executed the  
instrument.

WITNESS my hand and official seal.

Signature Mariane Sanchez



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA )  
EDISON COMPANY, ET AL. for a class 103 )  
License to Acquire, Possess, and Use )  
a Utilization Facility as Part of )  
Unit No. 2 of the San Onofre Nuclear )  
Generating Station )

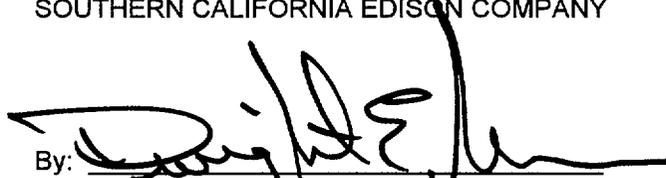
Docket No. 50-361  
Amendment Application  
No. 196

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit  
Amendment Application No. 196. This amendment application consists of Proposed Change  
No. PCN-512 to Facility Operating License NPF-10. PCN-512 is a request to revise Surveillance  
Requirement 3.0.3 to change the allowable time to perform a missed surveillance test.

Subscribed on this 19th day of January, 2000.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

By:   
Dwight E. Nunn  
Vice President

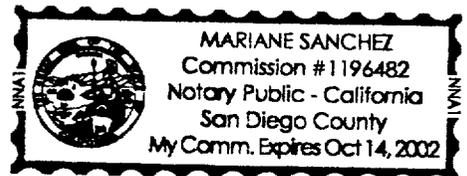
State of California  
County of San Diego

On 11/19/00 before me, Mariane Sanchez

personally appeared Dwight E. Nunn, personally known to me ~~(or~~  
~~proved to me on the basis of satisfactory evidence)~~ to be the person whose name is subscribed to the within  
instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his  
signature on the instrument the person, or the entity upon behalf of which the person acted, executed the  
instrument.

WITNESS my hand and official seal.

Signature Mariane Sanchez



## **ENCLOSURE**

**DESCRIPTION AND NO SIGNIFICANT HAZARDS CONSIDERATIONS  
OF PROPOSED CHANGE NUMBER**

**NPF-10/15-512**

**(PCN-512)**

**DESCRIPTION AND SAFETY ANALYSIS  
OF PROPOSED CHANGE NPF-10/15-512  
(PCN-512)**

PCN-512 is a request to revise Surveillance Requirement (SR) 3.0.3 of the Technical Specifications (TS) for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3) to extend the allowable time for completing a missed TS surveillance test before declaring the affected Limiting Condition For Operation (LCO) not met.

Existing Technical Specifications and Bases

Unit 2: See Attachment "A"  
Unit 3: See Attachment "B"

Proposed TS and Bases, PCN 512 (redline and strikeout)

Unit 2: See Attachment "C"  
Unit 3: See Attachment "D"

Proposed Technical Specifications and Bases, PCN 512

Unit 2: See Attachment "E"  
Unit 3: See Attachment "F"

**Description of Changes**

**SUMMARY:**

PCN-512 is a request to revise SR 3.0.3, which allows compliance with the requirement to declare an LCO not met to be delayed whenever it is discovered that a Surveillance was not performed within its specified Frequency (a missed Surveillance). The requirement currently allows a delay "up to 24 hours or up to the limit of the specified Frequency, whichever is less." PCN-512 requests the allowable delay be changed to "up to 24 hours or up to the limit of the specified Frequency, whichever is greater." PCN-512 conforms to proposed change TSTF-358 of the industry Technical Specification Task Force, which proposes a comparable change to NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants." PCN-512 is provided for NRC review in parallel with TSTF-358.

Also provided, for information only, are proposed additional Bases words that indicate the missed Surveillance should be performed at the first reasonable opportunity, and that the determination of the first reasonable opportunity should include the impact on plant risk and the impact on analysis assumptions, in addition to the consideration of

unit conditions, planning, availability of personnel and the actual time to perform the Surveillance. The Bases rewording also clarifies that for Surveillances with a Frequency not based on time intervals, the missed Surveillance should be performed at the first reasonable opportunity. The proposed Bases wording deviates from TSTF-358 in substituting the words "it is expected that the missed Surveillance will be performed" for the TSTF-358 words "the missed Surveillance shall be performed" in this instance. Southern California Edison (SCE) prefers not to use the word "shall" in the Bases, where the intent is "should." SCE notes that the word "shall" is not used in TSTF-358 in the Bases Insert to Surveillance Requirement 3.0.3, and prefers to use the insert wording in this instance as well.

Determination of "the first reasonable opportunity" should consider Code of Federal Regulations (CFR) requirements and allowances when the missed Surveillance Frequency is specified in terms of a CFR requirement. The allowance specified in SR 3.0.3 is not to be construed as superseding the CFR requirement.

## **1.0 BACKGROUND**

SONGS 2 & 3 has been a participant in the industry Technical Specification Task Force. This industry group has recently proposed a change to NUREG-1432, "Standard Technical Specifications Combustion Engineering Plants," to revise SR 3.0.3 as requested in this submittal. The industry proposal is identified as TSTF-358. SONGS 2 & 3 adopted the standard TS in 1996 under Amendments 127 and 116 for Units 2 and 3, respectively. PCN-512 is a request for the changes proposed by TSTF-358 to be applied to the SONGS 2 & 3 TS.

SONGS 2 & 3 SR 3.0.3 is the same as NUREG-1432 SR 3.0.3 in allowing a delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, to perform a missed Surveillance prior to having to declare the affected equipment inoperable. This is based on NRC Generic Letter 87-09, which states in part:

"It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed because the vast majority of surveillances do in fact demonstrate that systems or components are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of a Surveillance Requirement. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time for performing a missed surveillance before Shutdown Requirements apply, the TS should include a time limit that allows a delay of required actions to permit the performance of the missed surveillance based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and, of course[,] the safety significance of the delay in completing the surveillance. The staff has concluded that 24 hours is an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this limit, or when time is needed to obtain a temporary waiver of the Surveillance Requirement."

## 2.0 DISCUSSION

As currently written, SR 3.0.3 allows a delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, to perform a missed Surveillance prior to having to declare the affected equipment inoperable. However, there are Surveillances which could not be adequately performed in 24 hours, considering the planning, personnel, and in some cases, procedure development requirements which would be necessary, in addition to the actual time required for the performance of the test itself. Other Surveillances, when discovered to have been missed, may require a change in the operating state or MODE of the unit for performance of the missed Surveillance.

Upon discovery of a missed Surveillance requiring a change in state or MODE to perform, it would be necessary to either: (1) declare the affected LCO not met and enter the applicable Action(s), perhaps requiring a plant shutdown; (2) determine a method to perform the missed test in the current state or MODE; or, (3) request a Notice of Enforcement Discretion (NOED). The selected course of action would have to be completed within the 24 hour time limit of SR 3.0.3. A survey of selected licensees indicates that since 1996, more than 10 requests for NOEDs regarding missed Surveillances have been submitted. In some cases, issuance of the NOED was followed by an NRC request for the licensee to submit an exigent TS change request. This is an unnecessary burden on NRC and licensee resources.

## 3.0 AMENDMENT PROPOSAL

Southern California Edison proposes to amend the first paragraph of SR 3.0.3 from its present wording:

**If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.**

The proposed revised wording is:

**If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance.**

The proposed revised wording is consistent with proposed change TSTF-358 of the industry Technical Specification Task Force.

Southern California Edison also proposes to amend the wording of the supporting Technical Specification Bases for SR 3.0.3 as identified, for information only, in

Attachments C through F. The proposed revised Bases wording is consistent with proposed change TSTF-358 of the industry Technical Specification Task Force, including a statement of the expectation that a missed Surveillance will be performed at the first reasonable opportunity, taking into account the impact on plant risk and impact on any analysis assumptions, as well as unit conditions, planning, availability of personnel, and the time required to perform the Surveillance.

### **NO SIGNIFICANT HAZARDS CONSIDERATIONS:**

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10 CFR 50.92. A proposed amendment to a facility operating license involves no significant hazards consideration if operation of the facility in accordance with a proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. A discussion of these standards as they relate to this amendment request follows.

1. Will operation of the facility in accordance with this proposed change involve a significant increase in the probability or consequences of any accident previously evaluated?

Response: No

The proposed change would extend the maximum allowable time for completing a Surveillance not performed within its specified Frequency (a missed Surveillance) without declaring the affected Limiting Condition For Operation (LCO) not met. The presently allowed time is up to 24 hours from the time of discovery or up to the limit of the specified Frequency, whichever is less. The proposed allowed time is up to 24 hours from the time of discovery or up to the limit of the specified Frequency, whichever is greater.

Surveillances are rarely missed. This is demonstrated by a limited review of Licensee Event Reports (LERs), which found very few occurrences of missed Surveillances, given the number of LERs submitted and the large number of Surveillances performed. Moreover, Surveillances, whether performed inside or outside the required Frequency, nearly always verify conformance with Technical Specification requirements. This is demonstrated by a survey of selected licensees regarding entries into Surveillance Requirement (SR) 3.0.3. As stated in Generic Letter 87-09, "...the vast majority of surveillances do in fact demonstrate that systems or components are operable." As stated in the SR 3.0.2 Bases, "...the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements."

Therefore, it is unlikely that plant equipment would be inoperable during the time period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, that would be allowed under the proposed change for the completion of a missed Surveillance.

If, upon discovery of a missed Surveillance, it is known that the Surveillance would fail, SR 3.0.1 would require that the affected LCO be declared not met and the appropriate Condition(s) entered.

Performance of some Surveillances carries with it a slight risk, either from making some plant equipment temporarily inoperable or from performing plant manipulations, or both. The increase in plant risk from performing such Surveillances, combined with the confidence that a Surveillance test will be satisfactory when performed, together provide justification for extending the current allowable time to up to 24 hours or up to the specified Frequency, whichever is greater.

The foregoing discussion demonstrates that the probability or consequences of any accident previously evaluated will not be significantly increased by the proposed change.

2. Will operation of the facility in accordance with this proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

This amendment request is administrative in nature and does not involve any change to plant equipment. Therefore, it will not create the possibility of a new or different kind of accident from any previously evaluated.

3. Will operation of the facility in accordance with this proposed change involve a significant reduction in a margin of safety?

Response: No

This amendment request does not change the manner in which safety limits or limiting safety settings are determined.

As discussed above, Surveillances are rarely missed, and, when performed, Surveillances nearly always verify conformance with Technical Specification requirements, making it unlikely that plant equipment would be inoperable during

the time period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, that would be allowed under the proposed change for the completion of a missed Surveillance.

Therefore, the proposed change will not involve a significant reduction in a margin of safety.

**ENVIRONMENTAL CONSIDERATION:**

Southern California Edison has determined that the proposed Technical Specification change involves no changes in the amount or type of effluent that may be released offsite, and results in no increase in individual or cumulative occupational radiation exposure. As described above, the proposed TS amendment involves no significant hazards consideration and, as such, meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9).

**ATTACHMENT A**

**EXISTING TECHNICAL SPECIFICATIONS AND BASES  
SR 3.0.3**

**SONGS UNIT 2**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

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BASES

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SR 3.0.3  
(continued)

been completed within the specified Frequency. 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 SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 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 Required Actions for the applicable LCO 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

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BASES

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SR 3.0.3  
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Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

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**ATTACHMENT B**

**EXISTING TECHNICAL SPECIFICATIONS AND BASES  
SR 3.0.3**

**SONGS UNIT 3**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

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BASES

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SR 3.0.3  
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been completed within the specified Frequency. 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 SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 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 Required Actions for the applicable LCO 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

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BASES

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SR 3.0.3  
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Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

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**ATTACHMENT C**

**PROPOSED TECHNICAL SPECIFICATIONS AND BASES  
SR 3.0.3**

**(Redline and Strikeout)**

**SONGS UNIT 2**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

---

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~ greater. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

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BASES

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SR 3.0.3  
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been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is less/greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, or operational situations, or requirements of regulations (e.g., prior to entering MODE I after each fuel loading, or in accordance with 10CFR50 Appendix J as modified by approved exemptions, etc.), is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours up to the limit of the specified frequency to perform the Surveillance. However, since there is no time interval specified, it is expected that the missed Surveillance will be performed at the first reasonable opportunity.

SR 3.0.3 also provides a time limit for completion of and allowances for the performance of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

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SR 3.0.3  
(continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance.

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 Required Actions for the applicable LCO 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

Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

(continued)

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**ATTACHMENT D**

**PROPOSED TECHNICAL SPECIFICATIONS AND BASES  
SR 3.0.3**

**(Redline and Strikeout)**

**SONGS UNIT 3**

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less~~greater~~. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

(continued)

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BASES

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SR 3.0.3  
(continued)

been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency—, whichever is lessgreater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, ~~or~~ operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10CFR50 Appendix J as modified by approved exemptions, etc.), is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours—up to the limit of the specified frequency to perform the Surveillance. However, since there is no time interval specified, it is expected that the missed Surveillance will be performed at the first reasonable opportunity.

SR 3.0.3 ~~also~~ provides a time limit for completion of and allowances for the performance of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

(continued)

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BASES

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SR 3.0.3  
(continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance.

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 Required Actions for the applicable LCO 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

Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

(continued)

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**ATTACHMENT E**

**PROPOSED TECHNICAL SPECIFICATIONS AND BASES  
LCO 3.4.9**

**SONGS UNIT 2**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

(continued)

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BASES

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SR 3.0.3  
(continued)

been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10CFR50 Appendix J as modified by approved exemptions, etc.), is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of up to the limit of the specified frequency to perform the Surveillance. However, since there is no time interval specified, it is expected that the missed Surveillance will be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for and allowances for the performance of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

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BASES

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SR 3.0.3  
(continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance.

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 Required Actions for the applicable LCO 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

Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

(continued)

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**ATTACHMENT F**

**PROPOSED TECHNICAL SPECIFICATIONS AND BASES  
LCO 3.4.9**

**SONGS UNIT 3**

### 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

---

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

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SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. The Completion Times of the Required Actions begin immediately upon expiration of the delay period.

(continued)

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BASES

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SR 3.0.3  
(continued)

been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10CFR50 Appendix J as modified by approved exemptions, etc.), is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of up to the limit of the specified frequency to perform the Surveillance. However, since there is no time interval specified, it is expected that the missed Surveillance will be performed at the first reasonable opportunity.

SR 3.0.3 provides a time limit for and allowances for the performance of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

(continued)

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BASES

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SR 3.0.3  
(continued)

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance.

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 Required Actions for the applicable LCO 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

Required Actions for the applicable LCO Conditions 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 ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified Condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

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