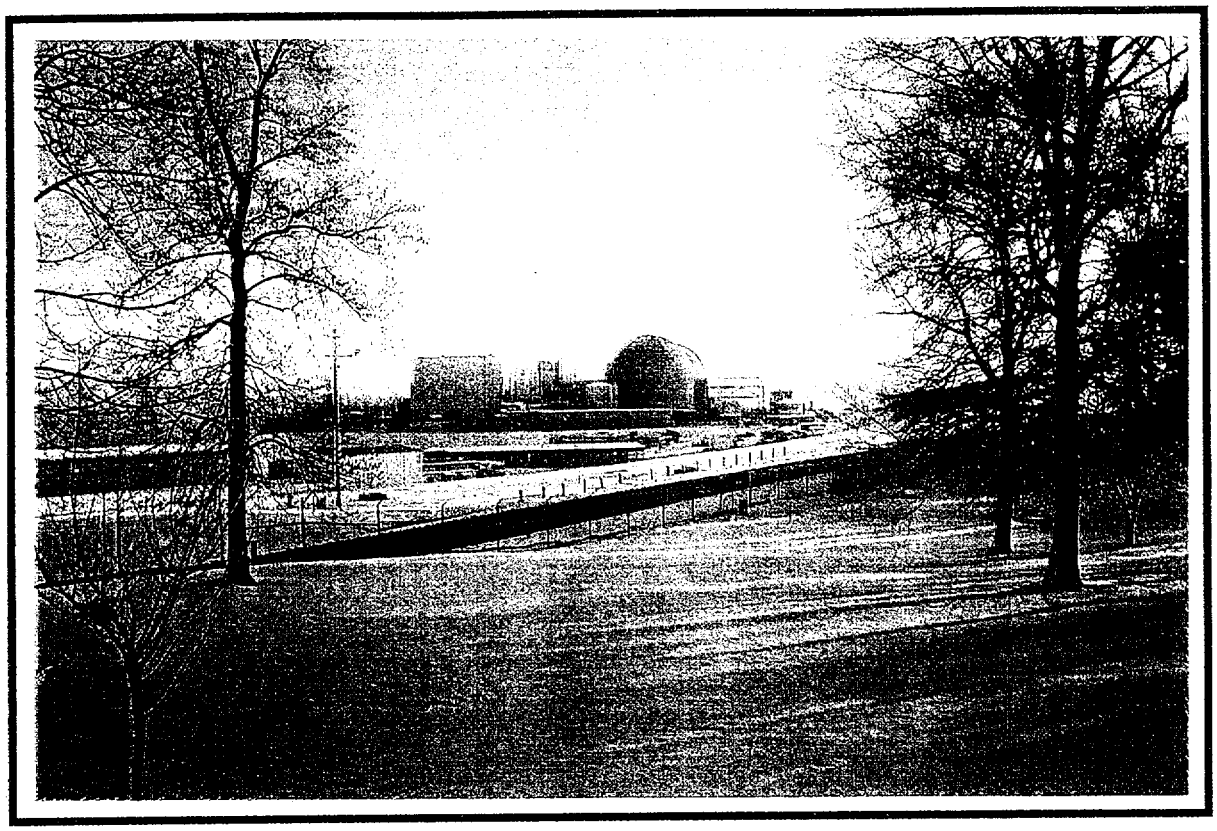
NORTH ANNA POWER STATION

Chapter 3.0
LCO and SR Applicability



VOLUME 6

Improved Technical Specifications

Dominion

NORTH ANNA POWER STATION

IMPROVED TECHNICAL SPECIFICATION CONVERSION

SECTION 3.0 - LCO AND SR APPLICABILITY

SECTION 3.0 - LCO AND SR APPLICABILITY

IMPROVED TECHNICAL SPECIFICATIONS

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 7 hours;

b. MODE 4 within 13 hours; and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

3.0 LCO APPLICABILITY

LCO 3.0.4

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.14, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

3.0 LCO APPLICABILITY

LCO 3.0.7 Test Exception LCOs 3.1.9 and 3.4.19 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

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. Surveillances may be performed by any series of sequential, overlapping, or total steps.

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.

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.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

3.0 SR APPLICABILITY

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4.

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SECTION 3.0 - LCO AND SR APPLICABILITY

IMPROVED TECHNICAL SPECIFICATIONS BASES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.6 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the (continued)

BASES

LCO 3.0.2 (continued)

unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Alternately, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/ trains of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

BASES

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

a. An associated Required Action and Completion Time is not met and no other Condition applies; or

b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a unit upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

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BASES

LCO 3.0.3 (continued)

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

a. The LCO is now met.

b. A Condition exists for which the Required Actions have now been performed.

c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.16, "Fuel Storage Pool Water Level." LCO 3.7.16 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO

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BASES

LCO 3.0.3 (continued)

can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.16 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.16 of "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

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

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BASES

LCO 3.0.4 (continued)

provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

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BASES

LCO 3.0.5 (continued)

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The

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BASES

LCO 3.0.6 (continued)

potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.14, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. A loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or (EXAMPLE B 3.0.6-1)

b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or (EXAMPLE B 3.0.6-2)

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BASES

LCO 3.0.6 (continued)

c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable. (EXAMPLE B 3.0.6-3)

EXAMPLE B 3.0.6-1

If System 2 of Train A is inoperable, and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5.

EXAMPLE B 3.0.6-2

If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5.

EXAMPLE B 3.0.6-3

If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10 and 11.

If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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LCO 3.0.6
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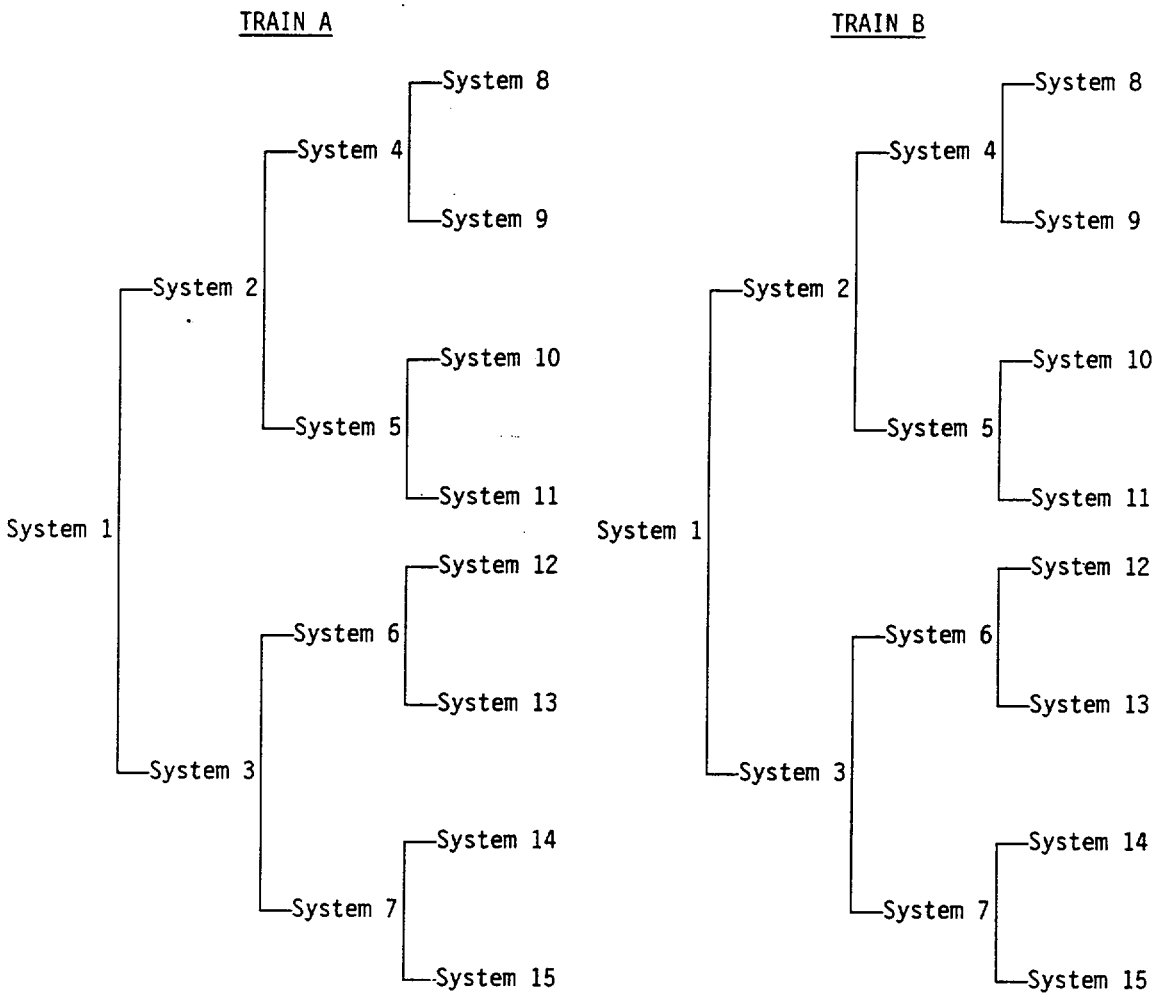

This loss of safety function does not require consideration of additional single failures or loss of offsite power. Since operation is being restricted in accordance with the ACTIONS of the support system, this accounts for any temporary loss of redundancy or single failure protection. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

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BASES

LCO 3.0.6 (continued)

When a loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately addresses the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs 3.1.9 and 3.4.19 allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs

SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1

SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. 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 SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the SRs; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Unplanned events may satisfy the requirements (include applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

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BASES

SR 3.0.1 (continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per..." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers unit operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is the Containment Leakage Rate Testing

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BASES

SR 3.0.2 (continued)

Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 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 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 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

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BASES

SR 3.0.3 (continued)

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 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.

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.

(continued)

BASES

SR 3.0.4 (continued)

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

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. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

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,

(continued)

BASES

SR 3.0.4 (continued)

condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, Mode 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

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SECTION 3.0 - LCO AND SR APPLICABILITY

IMPROVED STANDARD TECHNICAL SPECIFICATIONS

MARKUP AND JUSTIFICATION FOR DEVIATIONS

CTS

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.1

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2. (and LCO 3.0.7) TSTF-6

3.0.2

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

3.0.3

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 7 hours;

b. MODE 4 within 13 hours; and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

3.0.4

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

Rev.0

CTS

3.0 LCO APPLICABILITY

3.0.4

LCO 3.0.4 (continued)

Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

TSTF-104

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. (2) (5)

Reviewers's Note: LCO 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, LCO 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in LCO 3.0.4 were previously applicable in all MODES. Before this version of LCO 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS. (1)

New

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

(continued)

Rev. 0

CTS

3.0 LCO APPLICABILITY (continued)

New

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an additional evaluation shall be performed in accordance with Specification 5.5.14, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

TSTF-166 (4)

New

LCO 3.0.7

Test Exception LCOs 3.1.9, 3.1.10, 3.1.11, and 3.4.19 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

TSTF-12 (2)

Rev. 0

CTS

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

4.0.1 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.

Surveillances may be performed by means of any series of sequential, overlapping, or total steps.

(3)

4.0.2 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.

4.0.3 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.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be

(continued)

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CTS

3.0 SR APPLICABILITY

SR 3.0.3 (continued) declared not met, and the applicable Condition(s) must be entered.

4.0.4

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4.

Reviewer's Note: SR 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, SR 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in SR 3.0.4 were previously applicable in all MODES. Before this version of SR 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS.

(1)

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JUSTIFICATION FOR DEVIATIONS
SECTION 3.0, LCO AND SR APPLICABILITY

1. Reviewer's Notes are deleted as they are not part of the plant-specific ITS.

2. The brackets are removed and the proper plant specific information/value is provided.

3. The definitions related to instrument testing, such as CHANNEL CALIBRATION and CHANNEL OPERATIONAL TEST, contain a sentence stating that the tests may be performed by means of any series of sequential, overlapping, or total steps. However, it is an accepted industry practice that this concept applies equally to non-instrument related Surveillances. Therefore, a clarification is added to SR 3.0.1 and to the SR 3.0.1 Bases stating that Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided that the entire Surveillance is performed within the specified Frequency. This change has been proposed generically as WOG-142.

4. Cross references to other Specifications are revised to reflect other changes to the ITS.

5. Editorial change made for enhanced clarity or to be consistent with the ISTS Writers Guide.

SECTION 3.0 - LCO AND SR APPLICABILITY

IMPROVED STANDARD TECHNICAL SPECIFICATIONS BASES

MARKUP AND JUSTIFICATION FOR DEVIATIONS

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs

LCO 3.0.1 through LCO 3.0.6 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1

LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and

b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

(continued)

Rev.0

BASES

LCO 3.0.2 (continued)

ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Alternatives that would not result in redundant equipment being inoperable should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time other conditions exist which result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

Alternately, if intentional entry into ACTIONS, alternatives may

TSTF-122

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

(continued)

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BASES (continued)

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

a. An associated Required Action and Completion Time is not met and no other Condition applies; or

b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

unit (2)

(continued)

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BASES

LCO 3.0.3 (continued)

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

a. The LCO is now met.

b. A Condition exists for which the Required Actions have now been performed.

c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.[illegible], "Fuel Storage Pool Water Level." LCO 3.7.[illegible] has an Applicability of "During movement of irradiated fuel

(13) (13) (3)

(continued)

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BASES

LCO 3.0.3 (continued)

assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.15 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.15 of "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

(continued)

Rev.0

BASES

LCO 3.0.4 (continued)

that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

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LCO 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken. [In some cases (e.g., ..) these ACTIONS provide a Note that states "While this LCO is not met, entry into a MODE or other specified condition in the Applicability is not permitted, unless required to comply with ACTIONS." This Note is a requirement explicitly precluding entry into a MODE or other specified condition of the Applicability.]

(1)

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to

(continued)

The exceptions allow entry into MODES or other specified Conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time.

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BASES

LCO 3.0.5 (continued)

provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of SRs to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the ~~allowed SRs~~. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

required testing

required testing to demonstrate OPERABILITY

TSTF-165

LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the

(continued)

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BASES

LCO 3.0.6 (continued)

supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(14) Specification 5.5.15, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6. (3)

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support

(continued)

Rev 0

BASES

Insert 1

LCO 3.0.6 (continued)

system are OPERABLE, thereby ensuring safety function is retained. If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

TSTF-71

Insert 2

TSTF-273 → Insert 3

LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs {3.1.9, ~~3.1.10~~, ~~3.1.11~~} and 3.4.19} allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

① TSTF-12 ①

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

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INSERT 1

A loss of safety function may exist when a support system is inoperable, and:

a. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or (EXAMPLE B3.0.6-1)

b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or (EXAMPLE B3.0.6-2)

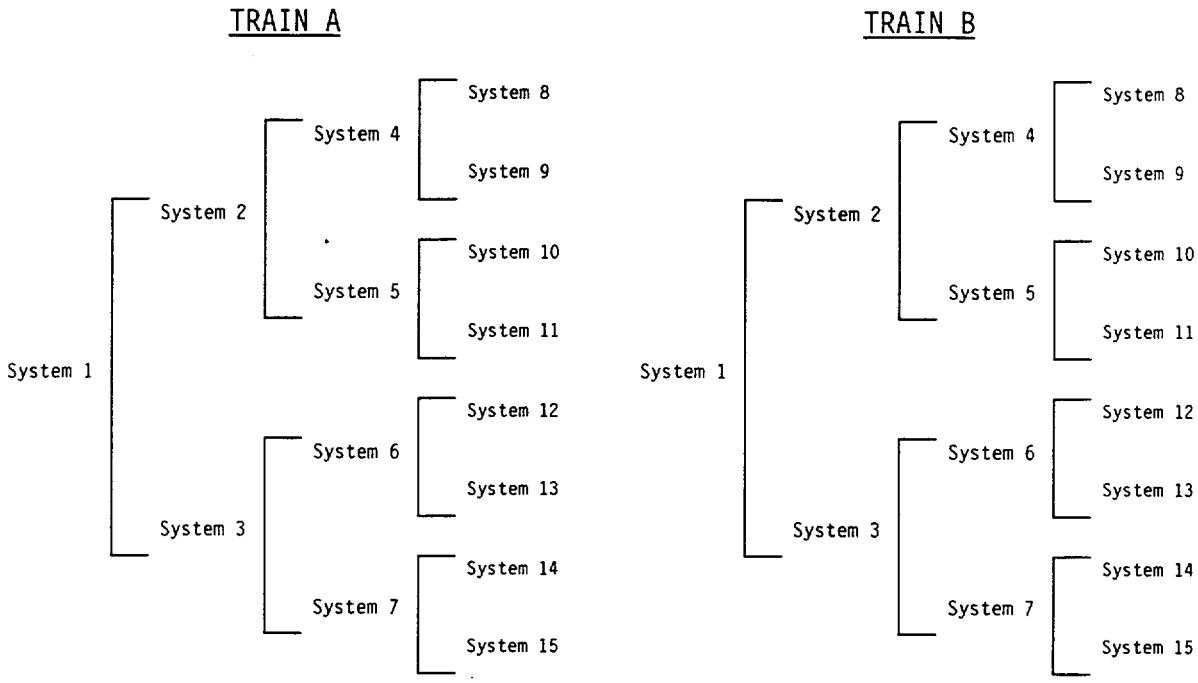
c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable. (EXAMPLE B3.0.6-3)

EXAMPLE B3.0.6-1
If System 2 of Train A is inoperable, and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5.

EXAMPLE B3.0.6-2
If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5.

EXAMPLE B3.0.6-3
If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10 and 11.

INSERT 2


TRAIN A
System 1
System 2
System 3
System 4
System 5
System 6
System 7
System 8
System 9
System 10
System 11
System 12
System 13
System 14
System 15
TRAIN B
System 1
System 2
System 3
System 4
System 5
System 6
System 7
System 8
System 9
System 10
System 11
System 12
System 13
System 14
System 15

INSERT 3

This loss of safety function does not require consideration of additional single failures or loss of offsite power. Since operation is being restricted in accordance with the ACTIONS of the support system, this accounts for any temporary loss of redundancy or single failure protection. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

When a loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately addresses the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs

SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1

SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. 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 SR 3.0.2, constitutes a failure to meet an LCO. (3)

Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

a. The systems or components are known to be inoperable, although still meeting the SRs; or

b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

Insert → TSTF-8

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.

(continued)

Rev.0

INSERT

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

BASES

SR 3.0.1 (continued)

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is a Surveillance with a Frequency of "in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions." The requirements of regulations take precedence over the TS. The TS cannot in and of themselves extend a test interval specified in the regulations.

An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations.

(continued)

Rev.0

BASES

SR 3.0.2 (continued)

Therefore, there is a Note in the Frequency stating, "SR 3.0.2 is not applicable." TSTF-52

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 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 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 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

(continued)

Rev. 0

BASES

SR 3.0.3 (continued)

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 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.

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.

(continued)

Rev.0

BASES

SR 3.0.4 (continued)

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

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. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

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,

(continued)

Rev.0

BASES

SR 3.0.4 (continued)

condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, Mode 2 from MODE 3, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Rev.0

1. The brackets have been removed and the proper plant specific information/value has been provided.

2. Changes are made (additions, deletions, and/or changes) to the ISTS which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.

3. The Bases are changed to reflect a change to the Specifications.

SECTION 3.0 - LCO AND SR APPLICABILITY

CURRENT TECHNICAL SPECIFICATIONS

MARKUP AND DISCUSSION OF CHANGES

UNIT 1

A.1

8-10-92

3/4.0 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

ITS

LIMITING CONDITION FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification. Insert 1

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour ACTION shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in :

1. At least HOT STANDBY within 6 hours,
2. At least HOT SHUTDOWN within the next 6 hours, and
3. At least COLD SHUTDOWN within the following 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. This specification is not applicable in MODES 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements.

3.0.5 When a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided:

1. Its corresponding normal or emergency power source is OPERABLE, and
2. All of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this Specification.

Unless both conditions 1. and 2. above are satisfied, within one hour ACTION shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY within 6 hours,
2. At least HOT SHUTDOWN within the next 6 hours, and
3. At least COLD SHUTDOWN within the following 24 hours.

Exceptions to these requirements are stated in the individual Specifications. This Specification is not applicable in MODES 5 or 6.

Insert proposed LCO 3.0.6

Insert proposed LCO 3.0.7

Insert proposed LCO 3.0.5

Rev. 0

INSERT 1

in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

INSERT 2

are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable.

INSERT 3

in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

A.1

3.0 APPLICABILITY

7-5-90

ITS

SURVEILLANCE REQUIREMENTS (SR)

A.1

in the Applicability

SR 3.0.1

4.0.1 Surveillance Requirements shall be ~~applicable~~ met during the ~~OPERATIONAL~~ MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in ~~an individual~~ the Surveillance Requirement. ← Insert 4

A.9

SR 3.0.2

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

Insert proposed SR 3.0.2

L.5

A.10

M.2

SR 3.0.3

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

A.9

Add proposed SR 3.0.3

M.1

A.11

A.9

in the Applicability of an LCO

S.R. 3.0.4

4.0.4 Entry into an ~~OPERATIONAL~~ MODE or other specified ~~applicability~~ condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been ~~performed~~ met within the stated surveillance interval ~~or as otherwise specified~~. Insert 5

A.1

A.12

L.4

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).

(See ITS 5.0)

INSERT 4

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. Surveillances may be performed by means of any series of sequential, overlapping, or total steps.

INSERT 5

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4.

ITS

(3.0) APPLICABILITY

(A.1)

(SR)

SURVEILLANCE REQUIREMENTS (Continued)

b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities	Required frequencies for performing inservice inspection and testing activities	13
Weekly	At least once per 7 days	
Monthly	At least once per 31 days	
Quarterly or every 3 months	At least once per 92 days	
Semiannually or every 6 months	At least once per 184 days	
Every 9 months	At least once per 276 days	
Yearly or annually	At least once per 366 days	

c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.

d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements. 13

e Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

(See ITS 5.0)

UNIT 2

ITS Section 3.0

A.1 (LCO)

8-10-92

3.0 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3.0.0 APPLICABILITY

A.1

ITS

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met. (Shall be met) (Insert 1) — A.2

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required. (Insert proposed LCO 3.0.2) — A.3

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour (and) ACTION shall be initiated to place the unit, in a MODE in which the Specification does not apply by placing it, as applicable, in : (5) — A.4

(Insert 2)

(MODE 3) 1. At least HOT STANDBY within (7) hours, (13)
(MODE 4) 2. At least HOT SHUTDOWN within the next (6) hours, and (37)
(MODE 5) 3. At least COLD SHUTDOWN within the following 24 hours. — A.5

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. This specification is not applicable in MODES 5 or 6. (only) (1, 2, 3, and 4) (Insert 3) — A.6

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications. (Insert proposed LCO 3.0.4) — A.7, L.1, L.4

3.0.5 When a system, subsystem, train, component, or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided:

1. Its corresponding normal or emergency power source is OPERABLE, and
2. All of its redundant system(s), subsystem(s), train(s), component(s), and device(s) are OPERABLE, or likewise satisfy the requirements of this Specification.

Unless both conditions 1. and 2. above are satisfied, within one hour ACTION shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in :

1. At least HOT STANDBY within 6 hours,
2. At least HOT SHUTDOWN within the next 6 hours, and
3. At least COLD SHUTDOWN within the following 24 hours.

Exceptions to these requirements are stated in the individual Specifications. This Specification is not applicable in MODES 5 or 6.

3.0.6 Insert proposed LCO 3.0.6 — L.3

3.0.7 Insert proposed LCO 3.0.7 — A.8

Insert proposed LCO 3.0.5 — L.2

INSERT 1

in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

INSERT 2

are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable.

INSERT 3

in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

A.1

3.0 APPLICABILITY

7-5-90

A.1

SURVEILLANCE REQUIREMENTS (SR)

ITS

in the Applicability

SR 3.0.1

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. (the) Insert 4

A.9 L.5

SR 3.0.2

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval. Insert proposed SR 3.0.2

A.10 M.2

A.9

SR 3.0.3

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

Add proposed SR 3.0.3

M.1 A.11 A.9

in the Applicability of an LCO

SR 3.0.4

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed (met) within the stated surveillance interval or as otherwise specified. Insert 5

A.1 A.12 L.4

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).

(See ITS 5.0)

INSERT 4

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. Surveillances may be performed by means of any series of sequential, overlapping, or total steps.

INSERT 5

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4.

ITS

8-21-80

(A.1)

(3.0) APPLICABILITY

(SR) SURVEILLANCE REQUIREMENTS (Continued)

(A.1)

b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities	Required frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.

d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

(See ITS 5.0)

ADMINISTRATIVE CHANGES

A.1 In the conversion of the North Anna Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 1, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 Unit 1 CTS 3.0.1 states, "Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each Specification." Unit 2 CTS 3.0.1 states, "Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met." ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as noted in LCO 3.0.2 and 3.0.7." This results in several changes to the CTS.

- Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "Limiting Conditions for Operation" is changed to "LCOs", and "OPERATIONAL MODES or other conditions specified" is changed to "MODES and other specified conditions" to be consistent with the ITS definition of MODE and the terminology used in the ITS.

  These changes are acceptable because they result in no change in the intent or application of the specification, but merely reflect editorial preferences used in the ITS.

- The Unit 1 phrase ". . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . ." and the Unit 2 phrase ". . . except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met" are moved from CTS 3.0.1 to ITS LCO 3.0.2 which states that when an LCO is not met, the Required Actions must be met.

  The change is acceptable because moving this information within the Technical Specifications results in no change in the intent or application of ACTIONS.

- The Unit 1 CTS 3.0.1 phrase "Limiting Conditions for Applicability . . . shall be applicable" and the Unit 2 CTS 3.0.1 phrase "Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required" are replaced in ITS LCO 3.0.1 with the phrase "LCOs shall be

met." This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (e.g., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (e.g.. the requirements in the LCO apply.)

This change is acceptable because it is an editorial change that does not change the intent of the requirements.

- The phrase "except as provided in LCO 3.0.2 and LCO 3.0.7" is added to CTS 3.0.1. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test Exception LCOs, which are exceptions to other LCOs.

  This change is acceptable because adding the exception for LCO 3.0.2 and LCO 3.0.7 prevents a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Specifications..

These changes are designated administrative because they are editorial and result in no technical changes to the Technical Specifications.

A.3 Unit 1 CTS 3.0.2 states, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the Specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." Unit 2 CTS 3.0.2 states the same requirements, but in the negative, as, "Noncompliance with a specification shall exist when the requirements of the Limiting Conditions for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Conditions for Operation is restored prior to expirations of the specified time intervals, completion of ACTION requirements is not required." ITS LCO 3.0.2 states, "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This results in several change to the CTS.

- The first sentence in Unit 1 CTS 3.0.2, states, in part, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the Specification." This requirement is divided into portions of ITS LCO 3.0.1, "LCOs shall be met" and ITS LCO 3.0.2, "Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met". This change is acceptable because the intent of the CTS requirement is preserved, but the aspects of

LCO compliance and the performance of ACTIONS when the LCO is not met are separated.

- Unit 2 CTS 3.0.2, states, "Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals." This sentence is deleted. This information currently is stated in Unit 2 CTS 3.0.1 and is moved to ITS 3.0.2 as described in Discussion of Change A.2. ITS 3.0.2 states that the Required Actions are to be taken when the LCO is not met. This rearrangement separates the description of LCOs (in ITS LCO 3.0.1) and the description of Required Actions (in ITS LCO 3.0.2). This change is acceptable because it makes the Unit 1 and Unit 2 descriptions of LCOs and Required Actions identical and improves clarity, without changing the intent of the CTS.

- The Unit 1 and Unit 2 CTS 3.0.2 are revised to include an exception for LCO 3.0.5 and 3.0.6. LCO 3.0.5 and LCO 3.0.6 are new allowances which take exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements. This change is acceptable because it includes references to new items in the ITS and results in no change to the CTS. Changes resulting from the incorporation of LCO 3.0.5 and LCO 3.0.6 are discussed in Discussions of Change L.2 and L.3.

- The second sentence of Unit 1 CTS LCO 3.0.2 states, "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The second sentence of Unit 2 CTS LCO 3.0.2 states, "If the Limiting Conditions for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required." These sentences state the same requirement. They are replaced in ITS LCO 3.0.2 with, "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This change is acceptable because, while worded differently, both the CTS and ITS state that ACTIONS do not have to be completed once the LCO is met or is no longer applicable. ITS LCO 3.0.2 also adds the phrase, "unless otherwise stated." There are some ITS ACTIONS which must be completed, even if the LCO is met or is no longer applicable. This change is acceptable because it reflects a new feature in the ITS which did not exist in the CTS. The technical aspects of these changes are discussed in the appropriate ITS sections.

These changes are designated as administrative because they are editorial and do not result in technical changes to the Technical Specifications.

A.4 CTS LCO 3.0.3 is applicable, "when a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable, "when an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions.

- ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken.

  This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

- ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The current Technical Specifications do not contain requirements that direct entry into LCO 3.0.3. The ITS does contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected specifications.

  This change is acceptable because referencing a new feature in the ITS is an editorial change.

These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.

A.5 CTS 3.0.3 states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS 3.0.3 states the time limits (Completion Times) from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3. The stated times in CTS 3.0.3 and ITS LCO 3.0.3 are listed below:

Mode	Title	CTS Time to Enter Mode	ITS Time to Enter Mode
--	(Current Mode)	1 hour to begin action	1 hour to begin action
3	Hot Standby	within 6 hours	7 hours
4	Hot Shutdown	next 6 hours	13 hours
5	Cold Shutdown	the following 24 hours	37 hours

These changes are acceptable because the ITS times are the sum of the CTS times (e.g., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours.) This changes the CTS presentation only, and the time allowed to enter each MODE is unchanged. Using MODE numbers instead of the corresponding MODE titles is an editorial preference which results in no change the requirements in the Technical Specifications. These changes are designated as administrative as they implement the

editorial conventions used in the ITS without resulting in technical changes to the specifications.

A.6 CTS 3.0.3 states, "Where corrective measures are completed that permit operation under the ACTION requirement, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states this as, "Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required."

This change is acceptable because the changes to CTS 3.0.3 are editorial. Both the CTS and ITS state that LCO 3.0.3 can be exited if the LCO which lead to the entry into LCO 3.0.3 is met, or if one of the ACTIONS of that LCO is applicable. The CTS requirement also specifies that the time to complete the ACTIONS in the LCO is based on the initial failure to meet the LCO. Reentering the LCO after exiting LCO 3.0.3 does not reset the ACTION statement time requirements. This information is not explicitly stated in ITS LCO 3.0.3 but is true under the multiple condition entry concept of the ITS. This change is designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.

A.7 Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." The Unit 2 CTS 3.0.4 is identical, except that the phrase, "unless otherwise excepted" is eliminated from the first sentence and a sentence is added stating, "Exceptions to these requirements are stated in individual specifications." ITS 3.0.4 states, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit. Exceptions to this Specification are stated in the individual Specifications." The addition of the phrase "except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time" is described in Discussion of Change L.1. The following changes are made to CTS 3.0.4:

- Unit 1 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." Unit 2 CTS 3.0.4 is the same, except as described above. ITS LCO 3.0.4 states, in

part, "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made" and "Exceptions to this Specification are stated in the individual Specifications." This change is acceptable because these requirements are equivalent. All are stating that a MODE or condition in the Applicability cannot be entered when an LCO applicable in that MODE or condition is not being met, unless the specification contains an explicit exception to 3.0.4.

This change is designated as administrative because the change is made for editorial preference and for consistency between the Unit 1 and Unit 2 requirements without technically changing the specifications.

- Unit 1 and Unit 2 CTS 3.0.4 states, "This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." ITS LCO 3.0.4 states in part, "This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS." This change is acceptable because these statements are equivalent. Both are stating that LCO 3.0.4 shall not prevent a unit shutdown required by the Technical Specifications. The ITS wording recognizes that there are conditions in the Applicability that are not MODES, such as "During Core Alterations."

  This change is designated as administrative as there is no change in the intent of CTS 3.0.4 and no additional flexibility is granted.

A.8 ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states, "Test Exception LCOs [3.1.8] and 3.4.19 allow specified Technical Specification requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications."

This change is acceptable because the current Technical Specifications contain test exception specifications which allow certain LCOs to not be met for the purpose of special tests and operations. However, the CTS does not contain the equivalent of LCO 3.0.7. As a result, there could be confusion regarding which LCOs are applicable during special tests and LCO 3.0.7 was crafted to avoid that possible confusion. LCO 3.0.7 is consistent with the use and application of current test exception Specifications and does not provide any new restriction or allowance. This change is designated as administrative because it does not technically change the specifications.

A.9 CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. The first sentence of CTS 4.0.3 states that failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation. The last sentence of CTS 4.0.3 states that Surveillance Requirements do not have to be performed on inoperable equipment. ITS SR 3.0.1 states that 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. Surveillances may be performed by means of any series of sequential, overlapping, or total steps. The changes to the CTS are:

- The first sentence of CTS 4.0.1 states that Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. ITS SR 3.0.1 states that SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR.

  This change is acceptable because the requirements are identical. Changes from Limiting Conditions for Operation to LCO, Surveillance Requirement to SR, and OPERATIONAL MODES to MODES are editorial preferences made to be consistent with the ITS format. This change is designated as administrative because the intent of the requirement is unchanged.

- The first sentence of CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved to ITS SR 3.0.1 which states, "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." This changes the CTS by adding the clarification, "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance."

  This change is acceptable because it is consistent with the current use and application of the Technical Specifications and with previous NRC guidance.

This change is designated as administrative because it clarifies the Technical Specifications with no change in intent.

- CTS 4.0.3 which states in part, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the operability requirements for a Limiting Condition for Operation." This information is moved from CTS 4.0.3 to ITS SR 3.0.1. ITS SR 3.0.1 states, "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3."

  This change is acceptable and is designated as administrative because moves information within the Technical Specifications with no change in intent. The reference to SR 3.0.3 is editorial and any technical changes resulting from SR 3.0.3 are discussed in another DOCs.

- CTS 4.0.3 states, in part, "Surveillance requirements do not have to be performed on inoperable equipment." ITS SR 3.0.1 states, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." This changes the CTS by including "variables within limits" in recognition that not all Surveillances test equipment, but may test variables such as boron concentration, power distribution factors, temperatures, and pressures. This does not change the current use and application of the statement in CTS 4.0.3.

  This change is acceptable and is designated as administrative because moves and clarifies information within the Technical Specifications with no change in intent.

- ITS 3.0.1 states, in part, "Surveillances may be performed by means of any series of sequential, overlapping, and total steps. This changes the CTS by explicitly stating an accepted industry practice. This does not change the current use and application of the statement in CTS 4.0.1.

  This change is acceptable and is designated as administrative because it clarifies information within the Technical Specifications with no change in intent.

A.10 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "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." This results in several changes to the CTS.

- ITS SR 3.0.2 adds to the CTS, "For Frequencies specified as 'once,' the above interval extension does not apply. This is described in DOC M.2.

- ITS SR 3.0.2 adds to the CTS, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L.5.

- ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications.

  This change is acceptable because the ITS presentation has the same intent as the CTS requirement.

- ITS SR 3.0.2 adds to the CTS, "Exceptions to this Specification are stated in the individual Specifications."

  This change is acceptable because it reflects practices used in the ITS that are not used in the CTS. Any changes to a specification, by inclusion of such an exception, will be addressed in the affected specification.

The changes are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.

A.11 CTS 4.0.3 states, in part, that the time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours. ITS 3.0.3 states that 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. When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the

applicable Condition(s) must be entered. This adds to the CTS that this delay period is permitted to allow performance of the Surveillance and that 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. When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. Changes to the time allowed to perform the missed Surveillance are described in DOC M.1.

This change is acceptable because this additional information does not change the current intent or application of CTS 4.0.3. It is understood that CTS 4.0.3 requires that the appropriate ACTIONS be taken if the SR is not performed during the time allowed by CTS 4.0.3 or if the SR is performed but fails. This change is designated as administrative because the added detail is consistent with the current intent and application of the Technical Specifications.

A.12 CTS 4.0.4 restricts entry into MODES or other conditions specified in the Applicability unless the applicable SRs have been successfully performed. ITS SR 3.0.4 contains the same restriction, but adds an allowance that, "This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." This changes the CTS in two ways:

- ITS SR 3.0.4 adds an allowance that failure to perform a Surveillance will not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

  This change is acceptable because it is consistent with the current understanding and application of CTS 4.0.4 and is necessary to avoid a conflict between SR 3.0.4 and other Specifications.

- ITS SR 3.0.4 adds an allowance that failure to perform a surveillance will not prevent entry into MODES or other specified conditions in the Applicability "that are part of a shutdown of the unit." ITS SR 3.0.4 is also only applicable in MODES 1, 2, 3 and 4. These changes are addressed in DOC L.4.

This change is designated as administrative because there is no change in the intent of CTS 4.0.4 and no additional flexibility granted.

MORE RESTRICTIVE CHANGES

M.1 CTS 4.0.3 states, in part, "The time limits of the action statement requirements are applicable at the time it is identified that a surveillance requirement has not been performed. The action statement requirements may be delayed for up to 24 hours to

permit the completion of the surveillance when the allowable outage time limits of the action statement requirements are less than 24 hours." ITS 3.0.3 states in part, "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 changes the CTS by basing the time allowed to perform a missed Surveillance before taking the Required Actions on the Surveillance Frequency instead of the allowed outage time.

- The purpose of CTS 4.0.3 is to permit the delay of the ACTIONS of the LCO for up to 24 hours when a required Surveillance has not been performed, if the allowed outage time of the action is less than 24 hours. For example, if the allowed outage time is 12 hours, 24 hours is allowed to perform the Surveillance. If the allowed outage time is 72 hours, the exception does not apply and the Action is entered. In all cases, the CTS allows at least 24 hours to perform the missed Surveillance. Similarly, ITS SR 3.0.3 permits the delay of declaring the LCO not met (and taking the ACTIONS) for up to 24 hours, or up to the limit of the specified Frequency of the Surveillance, whichever is less. For example, if the Surveillance Frequency is 12 hours, 12 hours is allowed. If the Surveillance Frequency is 72 hours, only 24 hours is allowed. Therefore, if the CTS allowed outage time and the ITS Surveillance Frequency are greater than 24 hours, both the CTS and the ITS require the Surveillance to be performed within 24 hours. However, if the CTS allowed outage time and the ITS Surveillance Frequency are less than 24 hours, the ITS will require the Surveillance to be performed sooner.

  This change is acceptable because this shortened delay period continues to provide 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. As a result, this more restrictive requirement has no detrimental effect on unit safety.

- The time allowed to perform a missed Surveillance prior to taking the ACTIONS is based on the allowed outage time in CTS 4.0.3 and on the Surveillance Frequency in ITS SR 3.0.3.

  This change is acceptable because the SR Frequency is more representative of the safety significance of the missed SR. Surveillance Frequencies less than 24 hours are frequent, easily performed tests. Therefore, a missed

Surveillance with a Frequency less than 24 hours should be able to be performed within the Surveillance Frequency.

These changes are designated as more restrictive because they reduce the time available to perform a missed Surveillance prior to taking the ACTIONS.

M.2 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "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." This changes the CTS by adding, "For Frequencies specified as 'once,' the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC L.5.

The purpose of the 1.25 extension allowance to Surveillance Frequencies is to allow for flexibility in scheduling tests. This change is acceptable because Frequencies specified as "once" are typically condition-based Surveillances in which the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Frequency without extension in order to avoid operation in unacceptable conditions. This change is designated as more restrictive because an allowance to extend Frequencies by 1.25 is eliminated from some Surveillances.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

L.1 CTS 3.0.4 does not allow entry into a MODE or condition specified in the Applicability when an LCO is not met and while relying on ACTIONS without a specific exception. ITS LCO 3.0.4 contains the same restriction, but includes an

allowance to enter a MODE or condition specified in the Applicability if "the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."

This change is acceptable because the ACTIONS that allow unlimited operation provide appropriate compensatory measures which protect the safety functions affected by the LCO not being met. In such a condition, allowing the unit to enter the MODES in which the LCO is applicable will have no detrimental effect on safety. For example, the Containment Isolation Valve ACTIONS for an inoperable valve allow unlimited operation provided that the valve is in its required position assumed in the safety analysis. Therefore, the safety function being protected by the LCO (in this example, containment isolation) continues to be protected. This change is designated as less restrictive because it will allow MODE changes under circumstances that would be prohibited under the CTS.

L.2 ITS LCO 3.0.5 is added to the CTS. ITS LCO 3.0.5 states, "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."

The purpose of ITS LCO 3.0.5 is to provide an exception to ITS LCO 3.0.2. ITS LCO 3.0.2 states that when an LCO is not met the Required Actions must be followed. ITS LCO 3.0.5 allows the performance of Surveillance Requirements to demonstrate the OPERABILITY of the equipment being returned to service or of other equipment that otherwise could not be performed without exiting the Applicability of the affected LCO. This LCO contains an allowance that, although utilized, is not stated in the CTS. This change is acceptable because it provides the flexibility to readily return equipment to service in order to restore the unit configuration to that assumed in the safety analysis. Some Technical Specifications ACTIONS require an inoperable component to be removed from service, such as maintaining an isolation valve closed or placing in trip an inoperable instrument channel. Under a strict reading of the CTS, the performance of SRs to demonstrate the OPERABILITY of the equipment being returned to service could not be performed under LCO 3.0.2 without the exception granted in LCO 3.0.5. Without this exception, a unit shutdown would be required to perform some Surveillance Requirements in Technical Specifications, to return repaired equipment to OPERABLE status, or to perform Surveillances to demonstrate OPERABILITY of equipment. This allowance will allow equipment to be returned to service and testing to be performed as necessary to demonstrate OPERABILITY. In addition, unnecessary unit shutdowns to perform required testing, which are undesirable transients, will be avoided. As a result, this change increases the safety of the unit. This change is designated as less restrictive because it will allow equipment to be

temporarily returned ~~to~~ service for testing when such actions are not explicitly allowed in the CTS.

L.3 CTS 3.0.5 provides an exception to the definition of OPERABILITY for normal and emergency power and to CTS 3.0.2. ITS LCO 3.0.6 replaces CTS 3.0.5 and expands the concept to apply to all Technical Specifications which support other Technical Specifications equipment, not only normal and emergency power. This changes the CTS in several ways.

- CTS 3.0.5 provides an exception to the definition of OPERABILITY and to the requirement to follow the Required Actions when an LCO is not met when a system, subsystem, train, or component is inoperable due to either the normal or emergency power source being inoperable. ITS LCO 3.0.6 expands that concept to all Technical Specifications systems supported by other Technical Specifications systems.

  This change is acceptable because the supporting systems in the ITS contain appropriate ACTIONS to address inoperability of those systems without relying on the ACTIONS of the supported systems or the ITS explicitly requires entry into those supported system's ACTIONS. This provides an option to declaring all supported systems inoperable and taking all of the Required Actions (referred to as "cascading") which can lead to overly restrictive ACTIONS and unnecessary unit transients. The ITS ACTIONS continue to provide appropriate compensatory actions to address system inoperabilities while simplifying the response to such events.

- CTS 3.0.5 allows a system, subsystem, train, or component to be considered OPERABLE if it is inoperable solely because either the normal or emergency power source is inoperable. ITS LCO 3.0.6 does not allow the Technical Specifications system supported by the inoperable system (i.e., the "supported system") to be considered OPERABLE, but the Conditions and Required Actions of the supported system do not have to be followed - only the inoperable system's (i.e., the "support system") Conditions and Required Actions must be followed.

  This change is acceptable because, under the definition of OPERABLE, the supported system cannot perform the specified safety function with the supporting system inoperable. The supported system should be considered inoperable. However, ITS allowance of not following the Conditions and Required Actions has the same effect as considering the system OPERABLE. Therefore, this change will have no effect on the operation and safety of the unit.

- CTS 3.0.5 contains conditions which ensure that, absent a subsequent failure, the system, subsystem, train, or component can perform its safety function.

ITS LCO 3.0.6 also requires an evaluation in accordance with ITS 5.5.14, Safety Function Determination Program, to determine if a loss of safety function exists. This determination is consistent with the evaluations performed under CTS 3.0.5. If a loss of safety function exists, CTS 3.0.5 directs a unit shutdown. ITS LCO 3.0.6 directs that the supported system be declared inoperable and the Conditions and Required Actions followed.

This change is acceptable because the allowance to declare the supported system inoperable instead of requiring a unit shutdown will apply appropriate compensatory measures and avoid unnecessary unit transients. This is appropriate as the actions given in CTS 3.0.5 may not be necessary for all conditions that could result in entry into ITS LCO 3.0.6.

- CTS 3.0.5 is only applicable in MODES 1 - 4, as the normal and emergency power requirements are different than in MODES 5 and 6. ITS LCO 3.0.6 is expanded to include all MODES.

  This change is acceptable given the expanded scope of ITS LCO 3.0.6 vice CTS 3.0.5. The support and supported relationships addressed in ITS LCO 3.0.6 may exist in all MODES, not only MODES 1 - 4 .

- ITS LCO 3.0.6 states that if a Required Action directs that a system be declared inoperable or directs entry into other Conditions or Required Actions, the LCO exception may not be used. In those cases, the Required Actions directing entry are necessary to ensure that the appropriate actions are taken to address the inoperability.

  This change is acceptable because the ACTIONS in the ITS sometimes direct that the Conditions and Required Actions of another Specification be followed in order to ensure that the necessary compensatory measures are performed.

This change is designated as less restrictive because the allowance in CTS 3.0.5 to not declare systems inoperable and follow the applicable ACTIONS in some situations is expanded in ITS LCO 3.0.6 to all support systems and all MODES.

L.4 CTS 3.0.4 and CTS 4.0.4 are applicable in all MODES and prevent entry into a MODE or other specified condition in the Applicability unless the LCO or SR, respectively, is satisfied. ITS LCO 3.0.4 and ITS SR 3.0.4 are only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4. In addition, ITS LCO 3.0.4 and ITS SR 3.0.4 do not prohibit entry into a MODE or other specified condition if such entry is part of a shutdown of the unit.

This change in Applicability from all MODES to MODES 1, 2, 3 and 4 is acceptable because the applicable Specifications contain adequate measures to allow MODE changes while relying on Actions. A review of the technical specifications that are

applicable in the MODES and conditions other than MODES 1, 2, 3 or 4 is provided in the table below. The "Discussion" column describes why moving from the Specification's Applicability to other MODES or specified conditions, other than MODES 1, 2, 3, 4, while relying on Actions, does not have an adverse effect on safety.

ITS SPECIFICATION	REQUIREMENT	APPLICABILITY	DISCUSSION
3.1.1	Shutdown Margin	MODE 2 with Keff < 1.0, MODES 3, 4 and 5.	If moving from MODE 5 to MODE 6, LCO 3.9.1 becomes applicable. If the boron concentration SDM is not within limits, both LCO 3.9.1 and 3.1.1 require immediate boration. Therefore, the SDM limits are protected when moving from MODE 5 to MODE 6. CORE ALTERATIONS or movement of irradiated fuel within the containment cannot be started from MODE 5.
3.3.1	Reactor Trip System Instrumentation	Manual reactor trip, source range neutron flux, automatic reactor trip, reactor trip breaker undervoltage and shunt trip mechanisms, and automatic trip logic are required to be OPERABLE.	In MODES 5 and 6, the reactor trip circuit breakers are open. There is no effect on RTS from moving from MODE 5 to 6. The consequences of inoperable source range neutron flux channels are discussed under LCO 3.9.2, below.
3.4.3	Reactor Coolant System (RCS) Pressure/Temperature Limits	At all times	LCO 3.4.3 is applicable at all times. The Action taken for not meeting the LCO is to immediately restore the parameters to within limits. Therefore, moving between MODES and conditions while relying on the Action has no effect on the Actions taken or the level of protection provided.
3.4.7	RCS Loops-MODE 5, Loops Filled	MODE 5 with RCS loops filled.	When in this Specification, it is possible to move to MODE 5, Loops not filled or MODE 6. The Actions taken in LCO 3.4.7 for MODE 5, Loops Filled are encompassed in the Actions taken in LCO 3.9.5, RHR and Coolant Circulation - High Water Level. As a result, moving to MODE 6 while relying on the Actions of LCOs 3.4.7 provides the same level of protection as that provided if the inoperability occurred in MODE 5. Therefore, allowing a MODE transition from 5 to 6 in this condition has no adverse effect on safety. The Actions for LCO 3.4.7 and 3.4.8 are essentially the same. Therefore, transitioning from MODE 5, loops filled, to MODE 5, loops not filled, while relying on Actions has no effect on the Actions taken or the level of protection provided.

ITS SPECIFICATION	REQUIREMENT	APPLICABILITY	DISCUSSION
3.4.8	RCS Loops, MODE 5 Loops Not Filled	MODE 5 with RCS loops not filled.	The Actions taken in LCO 3.4.8 for MODE 5, Loops Not Filled are encompassed in the Actions taken in LCO 3.9.6, RHR and Coolant Circulation - Low Water Level and LCO 3.4.7 RCS loops, MODE 5, loops filled. As a result, moving between these MODES and conditions while relying on the Actions of LCO 3.4.8 provides the same level of protection. Therefore, moving between MODES and conditions while relying on the Actions has no effect on the Actions taken or the level of protection provided
3.4.12	Low Temperature Overpressure Protection (LTOP) System	MODE 4 when all RCS cold leg temperatures is ≤ 235 °F (Unit 1) / 270 °F (Unit 2), MODE 5, MODE 6 when the reactor vessel head is on	The MODE 5 and 6 LTOP requirements and Actions are the same. Therefore, moving between MODE 6 and MODE 5 while relying on the Actions has no effect on the level of protection provided. CORE ALTERATIONS and movement or irradiated fuel does not occur in MODE 6 with the reactor vessel head on.
3.4.18	RCS Isolated Loop Startup	MODES 5 and 6	The MODE 5 and 6 requirements are the same (i.e., take immediate action to isolate an inadvertently started loop). Therefore, moving between MODE 6 and MODE 5 while relying on the Actions has no effect on the level of protection provided. CORE ALTERATIONS and movement or irradiated fuel would not begin in MODE 6 while relying on the Actions of 3.4.18 as all of the Actions have a Completion Time of "immediately."
3.7.10	Main Control Room and Emergency Switchgear Room Emergency Habitability System	MODES 1, 2, 3, 4, 5, 6, during movement of irradiated fuel, during CORE ALTERATIONS	The Actions are the same in all MODES and conditions. Therefore, moving between MODES while relying on Actions will have no effect on the actions being taken and has no adverse effect on safety.
3.7.11	Main Control Room and Emergency Switchgear Room Air Conditioning System	MODES 1, 2, 3, 4, 5, 6, during movement of irradiated fuel, during CORE ALTERATIONS	The Actions are the same in all MODES and conditions. Therefore, moving between MODES while relying on Actions will have no effect on the actions being taken and has no adverse effect on safety.

ITS SPECIFICATION	REQUIREMENT	APPLICABILITY	DISCUSSION
3.7.13	Fuel Storage Pool Water Level	During movement of irradiated fuel in the fuel building	The condition of the fuel storage pool is not MODE-related. That is, fuel may be moved in the fuel building while the reactor is in any MODE. The Actions for fuel pool water level not within limit (i.e., suspend movement of irradiated fuel assemblies in the fuel storage pool) has no relation to the reactor MODE. Therefore, changing MODES or conditions while relying on Actions has no effect on safety.
3.8.2	AC Sources - Shutdown	MODES 5 and 6, during movement of irradiated fuel	The requirements and Actions for AC Sources are the same in MODES 5 and 6 and during movement of irradiated fuel assemblies. As a result, moving between MODE 5 and 6, or between MODE 6 and movement of irradiated fuel assemblies has no effect on the level of protection provided and no effect on safety.
3.8.5	DC Sources - Shutdown	MODES 5 and 6, during movement of irradiated fuel	The requirements and Actions for DC Sources are the same in MODES 5 and 6 and during movement of irradiated fuel assemblies. As a result, moving between MODE 5 and 6, or between MODE 6 and movement of irradiated fuel assemblies, has no effect on the level of protection provided and no effect on safety.
3.8.6	Battery Cell Parameters	When the associated DC electrical power subsystems are required to be OPERABLE	Battery cell parameters are required to be in limit when the associated DC subsystems are required to be operable. Those subsystems are required to be OPERABLE in MODES 5 and 6, and during movement of irradiated fuel assemblies. As a result, moving between MODE 5 and 6, or between MODE 6 and movement of irradiated fuel assemblies, has no effect on the level of protection provided and no effect on safety.
3.8.8	Inverters - Shutdown	MODES 5 and 6, during movement of irradiated fuel assemblies	The requirements and Actions for Inverters - Shutdown are the same in MODES 5 and 6 and during movement of irradiated fuel assemblies. As a result, moving between MODE 5 and 6, or between MODE 6 and movement of irradiated fuel assemblies, has no effect on the level of protection provided and no effect on safety.
3.8.10	Distribution Systems - Shutdown	MODES 5 and 6, during movement of irradiated fuel assemblies	The requirements and Actions for Distribution System - Shutdown are the same in MODES 5 and 6 and during movement of irradiated fuel assemblies. As a result, moving between MODE 5 and 6, or between MODE 6 and movement of irradiated fuel assemblies, has no effect on the level of protection provided and no effect on safety.

ITS SPECIFICATION	REQUIREMENT	APPLICABILITY	DISCUSSION
3.9.1	Boron Concentration	MODE 6	The boron concentration is required to be within limits in MODE 6. These limits also apply during CORE ALTERATIONS and movement of irradiated fuel within the containment - all of which occur in MODE 6. The MODE 5 requirements are less strict (i.e., less boron required) but also require immediate actions to restore the required SDM. As a result, moving between MODE 5 and 6, or between MODE 6 and CORE ALTERATIONS or movement of irradiated fuel in containment, while relying on the Actions, would continue to require immediate action to restore compliance with the applicable LCO. Therefore, allowing such movement has no effect on the level of protection provided and no effect on safety.
3.9.3	Nuclear Instrumentation	MODE 6	Two source range neutron detectors are required to be OPERABLE in MODE 6 to detect reactivity changes due to the movement of fuel or boron dilution. Failure to meet the LCO requires immediate action to suspend CORE ALTERATIONS and positive reactivity additions and immediate action to restore one source range neutron detector. These requirements also apply during CORE ALTERATIONS and movement of irradiated fuel within the containment - all of which occur in MODE 6. The MODE 5 requirements on the source range neutron detectors only require suspension of operations involving positive reactivity additions when the detector(s) are inoperable, as fuel movement cannot occur in MODE 5. As a result, moving from MODE 6 to MODE 5, or between MODE 6 and CORE ALTERATIONS or movement of irradiated fuel in containment, while relying on the Actions, would continue to require immediate action to eliminate initiating events for which the detectors provide protection and immediate action to restore the detector(s) to OPERABLE status. Therefore, allowing such movement has no effect on the level of protection provided and no effect on safety.
3.9.4	Containment Penetrations	During CORE ALTERATIONS, during movement of irradiated fuel in containment	The Actions require the immediate suspension of CORE ALTERATIONS and the immediate suspension of movement of irradiated fuel assemble is within the containment. As a result, if the LCO is not met, it is immediately exited. It is not possible to transition to other MODES or specified conditions while relying on the ACTIONS. Therefore, allowing movement between MODES 5 and 6 and conditions specified in the Applicability has no effect on the level of protection provided and no effect on safety.

ITS SPECIFICATION	REQUIREMENT	APPLICABILITY	DISCUSSION
3.9.5	RHR and Coolant Circulation - High Water Level	MODE 6 with the water level ≥ 23 feet above the top of the reactor vessel flange	This specification also applies during CORE ALTERATIONS and movement of irradiated fuel within the containment - all of which occur in MODE 6. Moving from MODE 6 to CORE ALTERATIONS or movement of irradiated fuel assemblies within the containment has no effect on the Actions and the level of protection provided. Moving to MODE 5 with loops filled or loops not filled (LCO 3.4.7 or LCO 3.4.8) while relying on Actions is not possible since the water level is above the top of the reactor vessel head. Moving from MODE 6 with water ≥ 23 feet to MODE 6 with water < 23 feet (LCO 3.9.6) while relying on Actions will invoke either the same Actions (Action B) or an action to immediately initiate action to raise the water level to ≥ 23 feet, which exits LCO 3.9.6 and re-enters LCO 3.9.5. Therefore, allowing movement between MODES and conditions specified in the Applicability has no effect on the level of protection provided and no effect on safety
3.9.6	RHR and Coolant Circulation - Low Water Level	MODE 6 with the water level < 23 feet above the top of the reactor vessel flange	CORE ALTERATIONS and movement of irradiated fuel within the containment are prohibited in this condition by LCO 3.9.7. Moving to MODE 5 with loops filled or loops not filled (LCO 3.4.7 or LCO 3.4.8) while relying on Actions will invoke Actions that are equivalent to the those provided in this Specification. Therefore, there is no effect on the level of protection provided. Moving from MODE 6 with water < 23 feet to MODE 6 with water ≥ 23 feet (LCO 3.9.6) while relying on Actions is required by LCO 3.9.6, Action A.2. Therefore, allowing movement between MODES and conditions specified in the Applicability has no effect on the level of protection provided and no effect on safety
3.9.7	Refueling Cavity Water Level	During CORE ALTERATIONS (except during latching and unlatching of control rod drive shafts) and during movement of irradiated fuel assemblies within the containment	The Actions require the immediate suspension of CORE ALTERATIONS and the immediate suspension of movement of irradiated fuel assemblies within the containment. As a result, the Actions require the exiting of the Specification. Therefore, it is not possible to change MODES or conditions while relying on the Actions.

No circumstances were discovered in which restrictions should be applied to prevent moving from the Specification's Applicability to other MODES or specified conditions, other than MODES 1, 2, 3, 4, while relying on Actions.

The addition of the phrase, "or that are part of a shutdown of the unit" is necessary to clarify that transitioning to lower MODES is acceptable during the normal shutdown of the unit. Normal shutdowns may be shutdowns required by Technical Specifications that are commenced early (e.g., prior to the absolutely required shutdown, such as day 2 of an allowed 7 day Completion Time) or shutdowns for other purposes, such as refueling. For normal shutdowns, the shutdown would typically be performed with a full complement of OPERABLE safety systems consistent with the Bases of ITS 3.0.4, which states that the provisions of this Specification are not to be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering the associated MODE or other specified condition in the Applicability.

The addition of the allowance to perform a normal shutdown while relying on Actions is appropriate because the Technical Specifications contain appropriate controls to ensure the safety of the unit in these conditions. As the unit transitions to lower MODES, less equipment is required to be OPERABLE. For the equipment that is required to be OPERABLE in lower MODES, Required Actions can be divided into three categories.

- Some Required Actions provide a limited period of time to restore compliance with the LCO and then require that the unit be transitioned to a lower MODE to exit the Applicability of the LCO. Entering the Applicability of these LCOs while relying on Actions as part of a normal shutdown does not provide any additional flexibility than entering the Action while already in the Applicability as the Required Actions of the LCO would eventually require this transition.
- Some Required Actions provide a requirement to immediately take action to restore compliance with the LCO or exit the Applicability of the LCO (e.g., immediately stop Core Alterations). It is not permissible to intentionally enter Conditions in which the Required Action requires immediate action to remedy the condition. Therefore, these Actions do not provide additional flexibility.
- Some Required Actions allow continued operation in the Condition. Under ITS 3.0.4, entry into those LCOs is allowed as the Required Actions provide appropriate compensatory measures.

Therefore, the allowance to enter a MODE or other specified condition in the Applicability while relying on Actions during a normal shutdown does not provide inappropriate flexibility and no additional restrictions are needed in the ITS.

This change has been designated as less restrictive as it allows MODE changes in conditions that were prohibited under the CTS.

L.5 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "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." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC M.2.

This change is acceptable because the 25% Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions which must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Actions.

SECTION 3.0 - LCO AND SR APPLICABILITY

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

GENERIC NSHCs

10 CFR 50.92 EVALUATION
FOR
ADMINISTRATIVE CHANGES

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve reformatting, renumbering, and rewording of Technical Specifications with no change in intent. These changes, since they do not involve technical changes to the Technical Specifications, are administrative.

This type of change is connected with the movement of requirements within the current requirements, or with the modification of wording that does not affect the technical content of the current Technical Specifications. These changes will also include nontechnical modifications of requirements to conform to the Writer's Guide or provide consistency with the Improved Standard Technical Specifications in NUREG-1431. Administrative changes are not intended to add, delete, or relocate any technical requirements of the current Technical Specifications.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change involves reformatting, renumbering, and rewording the existing Technical Specifications. The reformatting, renumbering, and rewording process involves no technical changes to the existing Technical Specifications. As such, this change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed change will not impose any new or eliminate any old requirements. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The proposed change will not reduce a margin of safety because it has no effect on any safety analyses assumptions. This change is administrative in nature. Therefore, the change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
MORE RESTRICTIVE CHANGES

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve adding more restrictive requirements to the existing Technical Specifications by either making current requirements more stringent or by adding new requirements that currently do not exist.

These changes include additional commitments that decrease allowed outage times, increase the frequency of surveillances, impose additional surveillances, increase the scope of specifications to include additional plant equipment, increase the applicability of specifications, or provide additional actions. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change provides more stringent requirements for operation of the facility. These more stringent requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event. The more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed change does impose different requirements. However, these changes are consistent with the assumptions in the safety analyses and licensing basis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The imposition of more restrictive requirements either has no effect on or increases the margin of plant safety. As provided in the discussion of change, each change in this category is, by definition, providing additional restrictions to enhance plant safety. The change maintains requirements within the safety analyses and licensing basis. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
RELOCATED SPECIFICATIONS

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve relocating existing Technical Specification LCOs to licensee controlled documents.

The the Company has evaluated the current Technical Specifications using the criteria set forth in 10 CFR 50.36. Specifications identified by this evaluation that did not meet the retention requirements specified in the regulation are not included in the Improved Technical Specifications (ITS) submittal. These specifications have been relocated from the current Technical Specifications to the Technical Requirements Manual.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relocates requirements and surveillances for structures, systems, components or variables that do not meet the criteria of 10 CFR 50.36 (c)(2)(ii) for inclusion in Technical Specifications as identified in the Application of Selection Criteria to the North Anna Technical Specifications. The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and surveillances for these affected structures, systems, components or variables will be relocated from the Technical Specifications to the Technical Requirements Manual, which will be maintained pursuant to 10 CFR 50.59. In addition, the affected structures, systems, components or variables are addressed in existing surveillance procedures which are also controlled by 10 CFR.50.59 and subject to the change control provisions imposed by plant administrative procedures, which endorse applicable regulations and standards. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or change in the methods governing normal plant operation. The proposed change will not impose or eliminate any requirements and adequate control of existing requirements will be maintained. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The proposed change will not reduce a margin of safety because it has no significant effect on any safety analyses assumptions, as indicated by the fact that the requirements do not meet the 10 CFR 50.36 criteria for retention. In addition, the relocated requirements are moved without change and any future changes to these requirements will be evaluated per 10 CFR 50.59.

NRC prior review and approval of changes to these relocated requirements, in accordance with 10 CFR 50.92, will no longer be required. This review and approval does not provide a specific margin of safety which can be evaluated. However, since the proposed change is consistent with the Westinghouse Standard Technical Specifications, NUREG-1431 issued by the NRC, revising the Technical Specifications to reflect the approved level of detail gives assurance that this relocation does not result in a significant reduction in the margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES - REMOVED DETAIL

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve moving details out of the Technical Specifications and into the Technical Specifications Bases, the UFSAR, the TRM or other documents under regulatory control such as the Quality Assurance Program Topical Report. The removal of this information is considered to be less restrictive because it is no longer controlled by the Technical Specification change process. Typically, the information moved is descriptive in nature and its removal conforms with NUREG-1431 for format and content.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relocates certain details from the Technical Specifications to other documents under regulatory control. The Bases, UFSAR, and Technical Requirement Manual will be maintained in accordance with 10 CFR 50.59. In addition to 10 CFR 50.59 provisions, the Technical Specification Bases are subject to the change control provisions in the Administrative Controls Chapter of the Technical Specifications. The UFSAR is subject to the change control provisions of 10 CFR 50.71(e). Other documents are subject to controls imposed by Technical Specifications or regulations. Since any changes to these documents will be evaluated, no significant increase in the probability or consequences of an accident previously evaluated will be allowed. Therefore this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operations. The proposed change will not impose or eliminate any requirements, and adequate control of the information will be maintained. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

   The proposed change will not reduce a margin of safety because it has no effect on any safety analysis assumptions. In addition, the details to be moved from the Technical Specifications to other documents are not being changed. Since any future changes to these details will be evaluated under the applicable regulatory change control mechanism,

no significant reduction in a margin of safety will be allowed. A significant reduction in the margin of safety is not associated with the elimination of the 10 CFR 50.92 requirement for NRC review and approval of future changes to the relocated details. The proposed change is consistent with the Westinghouse Standard Technical Specifications, NUREG-1431, issued by the NRC Staff, revising the Technical Specifications to reflect the approved level of detail, which indicates that there is no significant reduction in the margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 1
RELAXATION OF LCO REQUIREMENTS

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve relaxation of the current Technical Specification (CTS) Limiting Conditions for Operation (LCOs) by the elimination of specific items from the LCO or Tables referenced in the LCO, or the addition of exceptions to the LCO.

These changes reflect the ISTS approach to provide LCO requirements that specify the protective conditions that are required to meet safety analysis assumptions for required features. These conditions replace the lists of specific devices used in the CTS to describe the requirements needed to meet the safety analysis assumptions. The ITS also includes LCO Notes which allow exceptions to the LCO for the performance of testing or other operational needs. The ITS provides the protection required by the safety analysis and provides flexibility for meeting the conditions without adversely affecting operations since equivalent features are required to be OPERABLE. The ITS is also consistent with the plant current licensing basis, as may be modified in the discussion of individual changes. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change provides less restrictive LCO requirements for operation of the facility. These less restrictive LCO requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event in that the requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the current safety analyses and licensing basis. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed change does impose different requirements. However, the change is consistent with the assumptions in the current safety analyses and licensing basis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The imposition of less restrictive LCO requirements does not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to ensure that the current safety analyses and licensing basis requirements are maintained. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 2
RELAXATION OF APPLICABILITY

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve relaxation of the applicability of current Technical Specification (CTS) Limiting Conditions for Operation (LCOs) by reducing the conditions under which the LCO requirements must be met.

Reactor operating conditions are used in CTS to define when the LCO features are required to be OPERABLE. CTS Applicabilities can be specific defined terms of reactor conditions or more general such as, "all MODES" or "any operating MODE." Generalized applicability conditions are not contained in ITS, therefore the ITS eliminates CTS requirements such as "all MODES" or "any operating MODE," replacing them with ITS defined MODES or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

CTS requirements may also be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminate or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS may be satisfied by exiting the applicability which takes the plant out of the conditions that require the safety system to be OPERABLE.

This change provides the protection required by the safety analysis and provides flexibility for meeting limits by restricting the application of the limits to the conditions assumed in the safety analyses. The ITS is also consistent with the plant current licensing basis, as may be modified in the discussion of individual changes. The change is generally made to conform with NUREG-1431 and has been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relaxes the conditions under which the LCO requirements for operation of the facility must be met. These less restrictive applicability requirements for the LCOs do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event in that the requirements continue to ensure that process variables, structures, systems, and components are maintained in the MODES and other specified conditions assumed in the safety analyses and licensing basis. Therefore, this change

does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The proposed change does impose different requirements. However, the requirements are consistent with the assumptions in the safety analyses and licensing basis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

The relaxed applicability of LCO requirements does not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to ensure that the LCO requirements are applied in the MODES and specified conditions assumed in the safety analyses and licensing basis. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 3
RELAXATION OF COMPLETION TIME

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve relaxation of the Completion Times for Required Actions in the current Technical Specifications (CTS).

Upon discovery of a failure to meet an LCO, the ITS specifies times for completing Required Actions of the associated TS Conditions. Required Actions of the associated Conditions are used to establish remedial measures that must be taken within specified Completion Times (referred to as Allowed Outage Times (AOTs) in the CTS). These times define limits during which operation in a degraded condition is permitted. Adopting Completion Times from the ITS is acceptable because the Completion Times take into account the operability status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. In addition, the ITS provides consistent Completion Times for similar conditions. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relaxes the Completion Time for a Required Action. Required Actions and their associated Completion Times are not initiating conditions for any accident previously evaluated and the accident analyses do not assume that required equipment is out of service prior to the analyzed event. Consequently, the relaxed Completion Time does not significantly increase the probability of any accident previously evaluated. The consequences of an analyzed accident during the relaxed Completion Time are the same as the consequences during the existing AOT. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the method governing normal plant operation. The Required Actions and associated Completion Times in the ITS have been evaluated to ensure that no new accident initiators are introduced. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The relaxed Completion Time for a Required Action does not involve a significant reduction in the margin of safety. As provided in the discussion of change, the change has been evaluated to ensure that the allowed Completion Time is consistent with safe operation under the specified Condition, considering the operability status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 4
RELAXATION OF REQUIRED ACTION

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve relaxation of the Required Actions in the current Technical Specifications (CTS).

Upon discovery of a failure to meet an LCO, the ITS specifies Required Actions to complete for the associated Conditions. Required Actions of the associated Conditions are used to establish remedial measures that must be taken in response to the degraded conditions. These actions minimize the risk associated with continued operation while providing time to repair inoperable features. Some of the Required Actions are modified to place the plant in a MODE in which the LCO does not apply. Adopting Required Actions from the ISTS is acceptable because the Required Actions take into account the operability status of redundant systems of required features, the capacity and capability of the remaining features, and the compensatory attributes of the Required Actions as compared to the LCO requirements. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relaxes Required Actions. Required Actions and their associated Completion Times are not initiating conditions for any accident previously evaluated and the accident analyses do not assume that required equipment is out of service prior to the analyzed event. Consequently, the relaxed Required Actions do not significantly increase the probability of any accident previously evaluated. The Required Actions in the ITS have been developed to provide appropriate remedial actions to be taken in response to the degraded condition considering the operability status of the redundant systems of required features, and the capacity and capability of remaining features while minimizing the risk associated with continued operation. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The Required Actions and associated Completion Times in the ITS have been evaluated to ensure that no new accident initiators are introduced. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

The relaxed Required Actions do not involve a significant reduction in the margin of safety. As provided in the discussion of change, this change has been evaluated to minimize the risk of continued operation under the specified Condition, considering the operability status of the redundant systems of required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 5
DELETION OF SURVEILLANCE REQUIREMENT

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve deletion of Surveillance Requirements in the current Technical Specifications (CTS).

The CTS require safety systems to be tested and verified Operable prior to entering applicable operating conditions. The ITS eliminates unnecessary CTS Surveillance Requirements that do not contribute to verification that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner and at a frequency necessary to give confidence that the equipment can perform its assumed safety function. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change deletes Surveillance Requirements. Surveillances are not initiators to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be Operable and capable of performing the accident mitigation functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. The remaining Surveillance Requirements are consistent with industry practice and are considered to be sufficient to prevent the removal of the subject Surveillances from creating a new or different type of accident. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The deleted Surveillance Requirements do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the change has been evaluated to ensure that the deleted Surveillance Requirements are not necessary for verification that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner and at a frequency necessary to give confidence that the equipment can perform its assumed safety function. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 6
RELAXATION OF SURVEILLANCE REQUIREMENT ACCEPTANCE CRITERIA

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve the relaxation of Surveillance Requirements acceptance criteria in the current Technical Specifications (CTS).

The CTS require safety systems to be tested and verified Operable prior to entering applicable operating conditions. The ITS eliminates or relaxes the Surveillance Requirement acceptance criteria that do not contribute to verification that the equipment used to meet the LCO can perform its required functions. For example, the ITS allows some Surveillance Requirements to verify Operability under actual or test conditions. Adopting the ITS allowance for "actual" conditions is acceptable because required features cannot distinguish between an "actual" signal or a "test" signal. Also included are changes to CTS requirements that are replaced in the ITS with separate and distinct testing requirements which, when combined, include Operability verification of all TS required components for the features specified in the CTS. Adopting this format preference in the ISTS is acceptable because Surveillance Requirements that remain include testing of all previous features required to be verified OPERABLE. Changes which provide exceptions to Surveillance Requirements to provide for variations which do not affect the results of the test are also included in this category. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relaxes the acceptance criteria of Surveillance Requirements. Surveillances are not initiators to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be Operable and capable of performing the accident mitigation functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The relaxed acceptance criteria for Surveillance Requirements do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the relaxed Surveillance Requirement acceptance criteria have been evaluated to ensure that they are sufficient to verify that the equipment used to meet the LCO can perform its required functions. Thus, appropriate equipment continues to be tested in a manner that gives confidence that the equipment can perform its assumed safety function. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 7
RELAXATION OF SURVEILLANCE FREQUENCY

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve the relaxation of Surveillance Frequencies in the current Technical Specifications (CTS).

CTS and ITS Surveillance Frequencies specify time interval requirements for performing surveillance testing. Increasing the time interval between Surveillance tests in the ITS results in decreased equipment unavailability due to testing which also increases equipment availability. In general, the ITS contain test frequencies that are consistent with industry practice or industry standards for achieving acceptable levels of equipment reliability. Adopting testing practices specified in the ITS is acceptable based on similar design, like-component testing for the system application and the availability of other Technical Specification requirements which provide regular checks to ensure limits are met. Relaxation of Surveillance Frequency can also include the addition of Surveillance Notes which allow testing to be delayed until appropriate unit conditions for the test are established, or exempt testing in certain MODES or specified conditions in which the testing can not be performed.

Reduced testing can result in a safety enhancement because the unavailability due to testing is reduced and; in turn, reliability of the affected structure, system or component should remain constant or increase. Reduced testing is acceptable where operating experience, industry practice or the industry standards such as manufacturers' recommendations have shown that these components usually pass the Surveillance when performed at the specified interval, thus the frequency is acceptable from a reliability standpoint. Surveillance Frequency changes to incorporate alternate train testing have been shown to be acceptable where other qualitative or quantitative test requirements are required which are established predictors of system performance. Surveillance Frequency extensions can be based on NRC-approved topical reports. The NRC staff has accepted topical report analyses that bound the plant-specific design and component reliability assumptions. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change relaxes Surveillance Frequencies. The relaxed Surveillance Frequencies have been established based on achieving acceptable levels of equipment reliability. Consequently, equipment which could initiate an accident previously evaluated will continue to operate as expected and the probability of the initiation of any accident previously evaluated will not be significantly increased. The equipment being

tested is still required to be Operable and capable of performing any accident mitigation functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly affected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

The relaxed Surveillance Frequencies do not result in a significant reduction in the margin of safety. As provided in the discussion of change, the relaxation in the Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. Thus, appropriate equipment continues to be tested at a Frequency that gives confidence that the equipment can perform its assumed safety function when required. Therefore, this change does not involve a significant reduction in a margin of safety.

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES – CATEGORY 8
DELETION OF REPORTING REQUIREMENTS

The North Anna Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Some of the proposed changes involve the deletion of requirements in the current Technical Specifications (CTS) to send reports to the NRC.

The CTS includes requirements to submit reports to the NRC under certain circumstances. However, the ITS eliminates these requirements for many such reports and, in many cases, relies on the reporting requirements of 10 CFR 50.73 or other regulatory requirements. The ITS changes to reporting requirements are acceptable because the regulations provide adequate reporting requirements, or the reports do not affect continued plant operation. Therefore, this change has no effect on the safe operation of the plant. These changes are generally made to conform with NUREG-1431 and have been evaluated to not be detrimental to plant safety.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?**

   The proposed change deletes reporting requirements. Sending reports to the NRC is not an initiator to any accident previously evaluated. Consequently, the probability of any accident previously evaluated is not significantly increased. Sending reports to the NRC has no effect on the ability of equipment to mitigate an accident previously evaluated. As a result, the consequences of any accident previously evaluated is not significantly affected. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The deletion of reporting requirements does not result in a significant reduction in the margin of safety. The ITS eliminates the requirements for many such reports and, in many cases, relies on the reporting requirements of 10 CFR 50.73 or other regulatory requirements. The change to reporting requirements does not affect the margin of safety because the regulations provide adequate reporting requirements, or the reports do not affect continued plant operation. Therefore, this change does not involve a significant reduction in a margin of safety.

This proposed Technical Specification change has been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). The following is a discussion of how the proposed Technical Specification change meets the criteria for categorical exclusion.

10 CFR 51.22(c)(9): Although the proposed change involves changes to requirements with respect to inspection or surveillance requirements,

(i) proposed change involves No Significant Hazards Considerations (refer to the Determination of No Significant Hazards Considerations section of this Technical Specification Change Request);

(ii) there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite since the proposed changes do not affect the generation of any radioactive effluents nor do they affect any of the permitted release paths; and

(iii) there is no significant increase in individual or cumulative occupational radiation exposure.

Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Based on the aforementioned and pursuant to 10 CFR 51.22 (b), no environmental assessment or environmental affect statement need be prepared in connection with issuance of an amendment to the Technical Specifications incorporating the proposed change of this request.

SECTION 3.0 - LCO AND SR APPLICABILITY

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

SPECIFIC NSHCs

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES

SECTION 3.0, LCO AND SR APPLICABILITY, CHANGE L.1

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

> CTS 3.0.4 does not allow entry into a MODE or condition specified in the Applicability when an LCO is not met and while relying on ACTIONS without a specific exception. ITS LCO 3.0.4 contains the same restriction, but includes an allowance to enter a MODE or condition specified in the Applicability if "the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time."
>
> This change is acceptable because the ACTIONS that allow unlimited operation provide appropriate compensatory measures which protect the safety functions affected by the LCO not being met. In such a condition, allowing the unit to enter the MODES in which the LCO is applicable will have no detrimental effect on safety. For example, the Containment Isolation Valve ACTIONS for an inoperable valve allow unlimited operation provided that the valve is in its required position assumed in the safety analysis. Therefore, the safety function being protected by the LCO (in this example, containment isolation) continues to be protected. This change is designated as less restrictive because it will allow MODE changes under circumstances that would be prohibited under the CTS.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**

   The proposed change allows entering a MODE or other specified condition in the Applicability when the LCO is not met provided that the ACTIONS to be entered permit continued operation for an unlimited period of time. If the inoperability of a component or variable could increase the probability of an accident previously

evaluated, the corresponding ACTIONS would not allow operation in that condition for an unlimited period of time. As a result, the probability of an accident previously evaluated is not affected by this change. ACTIONS which allow operation for an unlimited period of time with an inoperable component or variable provide compensatory measures which protect the affected safety function, which includes any mitigation actions assumed in accidents previously evaluated. For example, inoperable isolation valves are closed or inoperable instrument channels are placed in trip. Since the affected safety functions continue to be protected, the mitigation functions of the component or variable continue to be performed. As a result, the consequences of any accident previously evaluated are not increased significantly. Therefore, this change will not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change allows entering a MODE or other specified condition in the Applicability when the LCO is not met provided that the ACTIONS to be entered permit continued operation for an unlimited period of time. This change will not physically alter the plant (no new or different type of equipment will be installed). The change also does not require any new or unusual operator actions in that operation of the unit while complying with ACTIONS is common. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

The proposed change allows entering a MODE or other specified condition in the Applicability when the LCO is not met provided that the ACTIONS to be entered permit continued operation for an unlimited period of time. This change will allow unit operation in MODES or other specified conditions in the Applicability while relying on ACTIONS that would have been previously prohibited. However, ACTIONS which allow operation for an unlimited period of time with an inoperable component or variable provide adequate compensatory measures which ensure the affected safety function is maintained, and, as a result, the margin of safety is not significantly affected. Therefore, this change does not involve a significant reduction in a margin of safety.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES

SECTION 3.0, LCO AND SR APPLICABILITY, CHANGE L.2

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

ITS LCO 3.0.5 is added to the CTS. ITS LCO 3.0.5 states, "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."

The purpose of ITS LCO 3.0.5 is to provide an exception to ITS LCO 3.0.2. ITS LCO 3.0.2 states that when an LCO is not met the Required Actions must be followed. ITS LCO 3.0.5 allows the performance of Surveillance Requirements to demonstrate the OPERABILITY of the equipment being returned to service or of other equipment that otherwise could not be performed without exiting the Applicability of the affected LCO. This LCO contains an allowance that, although utilized, is not stated in the CTS. This change is acceptable because it provides the flexibility to readily return equipment to service in order to restore the plant configuration to that assumed in the safety analysis. Some Technical Specifications ACTIONS require an inoperable component to be removed from service, such as maintaining an isolation valve closed or placing in trip an inoperable instrument channel. Under a strict reading of the CTS, the performance of SRs to demonstrate the OPERABILITY of the equipment being returned to service could not be performed under LCO 3.0.2 without the exception granted in LCO 3.0.5. Without this exception, a unit shutdown would be required to perform some Surveillance Requirements in Technical Specifications, to return repaired equipment to OPERABLE status, or to perform Surveillances to demonstrate OPERABILITY of equipment. This allowance will allow equipment to be returned to service and testing to be performed as necessary to demonstrate OPERABILITY. In addition, unnecessary unit shutdowns to perform required testing, which are undesirable transients, will be avoided. As a result, this change increases the safety of the unit. This change is designated as less restrictive because it will allow equipment to be

temporarily returned to service for testing when such actions are not explicitly allowed in the CTS.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**

   The proposed change allows equipment removed from service or declared inoperable to comply with ACTIONS to be returned to service under administrative control solely to perform testing required to demonstrate its operability or the operability of other equipment. Restoring equipment to service under administrative control will not initiate an accident previously evaluated. If such restoration would initiate an accident previously evaluated, the equipment would not be restored. As a result, the probability of an accident previously evaluated is not significantly increased. Should an accident previously evaluated occur while the equipment is temporarily returned to service, the consequences of the accident would not be significantly increased. As stated in Generic Letter 87-09, "the vast majority of Surveillances do in fact demonstrate that systems or components are operable." It is expected that the equipment returned to service for testing to verify operability will be determined to be operable and capable of performing any mitigation functions assumed in an accident previously evaluated. Therefore, the change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change allows equipment removed from service or declared inoperable to comply with actions to be returned to service under administrative control solely to perform testing required to demonstrate its operability or the operability of other equipment. This change will not physically alter the plant (no new or different types of equipment will be installed). The change also does not require any new or unusual operator actions. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

   The proposed change allows equipment removed from service or declared inoperable to comply with actions to be returned to service under administrative control solely to perform testing required to demonstrate its operability or the operability of other equipment. The alternative to this allowance is to require that the unit be taken out of the applicable MODES or other specified conditions prior to performing the testing

necessary to establish operability of the component or variable. This would delay the return to service of the inoperable component or variable, which is detrimental to unit safety. It would also result in unit transients as unit shutdowns may be needed to perform many tests needed to demonstrate operability. Given that the vast majority of surveillances do in fact demonstrate that the systems or components are operable, the detrimental effects on unit safety due to additional transients is unjustified. Providing the allowance to return equipment to service for testing to demonstrate operability improves unit safety. Therefore, this change does not involve a significant reduction in a margin of safety.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES

SECTION 3.0, LCO AND SR APPLICABILITY, CHANGE L.3

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

CTS 3.0.5 provides an exception to the definition of OPERABILITY for normal and emergency power and to CTS 3.0.2. ITS LCO 3.0.6 replaces CTS 3.0.5 and expands the concept to apply to all Technical Specifications which support other Technical Specifications equipment, not only normal and emergency power. This changes the CTS in several ways.

- CTS 3.0.5 provides an exception to the definition of OPERABILITY and to the requirement to follow the Required Actions when an LCO is not met when a system, subsystem, train, or component is inoperable due to either the normal or emergency power source being inoperable. ITS LCO 3.0.6 expands that concept to all Technical Specifications systems supported by other Technical Specifications systems.

  This change is acceptable because the supporting systems in the ITS contain appropriate ACTIONS to address inoperability of those systems without relying on the ACTIONS of the supported systems or the ITS explicitly requires entry into those supported system's ACTIONS. This provides an option to declaring all supported systems inoperable and taking all of the Required Actions (referred to as "cascading") which can lead to overly restrictive ACTIONS and unnecessary unit transients. The ITS ACTIONS continue to provide appropriate compensatory actions to address system inoperabilities while simplifying the response to such events.

- CTS 3.0.5 allows a system, subsystem, train, or component to be considered OPERABLE if it is inoperable solely because either the normal or emergency power source is inoperable. ITS LCO 3.0.6 does not allow the Technical Specifications system supported by the inoperable system (i.e., the "supported system") to be considered OPERABLE, but the Conditions and Required Actions of the supported system do not have to be followed - only the

inoperable system's (i.e., the "support system") Conditions and Required Actions must be followed.

This change is acceptable because, under the definition of OPERABLE, the supported system cannot perform the specified safety function with the supporting system inoperable. The supported system should be considered inoperable. However, ITS allowance of not following the Conditions and Required Actions has the same effect as considering the system OPERABLE. Therefore, this change will have no effect on the operation and safety of the unit.

- CTS 3.0.5 contains conditions which ensure that, absent a subsequent failure, the system, subsystem, train, or component can perform its safety function. ITS LCO 3.0.6 also requires an evaluation in accordance with ITS 5.5.14, Safety Function Determination Program, to determine if a loss of safety function exists. This determination is consistent with the evaluations performed under CTS 3.0.5. If a loss of safety function exists, CTS 3.0.5 directs a unit shutdown. ITS LCO 3.0.6 directs that the supported system be declared inoperable and the Conditions and Required Actions followed.

  This change is acceptable because the allowance to declare the supported system inoperable instead of requiring a unit shutdown will apply appropriate compensatory measures and avoid unnecessary unit transients. This is appropriate as the actions given in CTS 3.0.5 may not be necessary for all conditions that could result in entry into ITS LCO 3.0.6.

- CTS 3.0.5 is only applicable in MODES 1 - 4, as the normal and emergency power requirements are different than in MODES 5 and 6. ITS LCO 3.0.6 is expanded to include all MODES.

  This change is acceptable given the expanded scope of ITS LCO 3.0.6 vice CTS 3.0.5. The support and supported relationships addressed in ITS LCO 3.0.6 may exist in all MODES, not only MODES 1 - 4 .

- ITS LCO 3.0.6 states that if a Required Action directs that a system be declared inoperable or directs entry into other Conditions or Required Actions, the LCO exception may not be used. In those cases, the Required Actions directing entry are necessary to ensure that the appropriate actions are taken to address the inoperability.

  This change is acceptable because the ACTIONS in the ITS sometimes direct that the Conditions and Required Actions of another Specification be followed in order to ensure that the necessary compensatory measures are performed.

This change is designated as less restrictive because the allowance in CTS 3.0.5 to not declare systems inoperable and follow the applicable ACTIONS in some situations is expanded in ITS LCO 3.0.6 to all support systems and all MODES.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**

   The proposed change provides an allowance such that when a support system in the Technical Specifications is inoperable resulting in a supported system in the Technical Specifications being inoperable, only the ACTIONS of the support system must be followed. The change also requires an evaluation to be performed to determine if a loss of safety function exists. The support system ACTIONS in the ITS have been structured to provide the appropriate preventative and compensatory measures when the support system is inoperable without reliance on the ACTIONS of the supported systems, or the support system ACTIONS explicitly direct entry into the supported systems ACTIONS. As a result, while the failure of a system or component may affect the probability of an accident, the ITS ACTIONS taken after such a failure will not. Therefore, this change will have not effect on the probability of an accident previously evaluated. The consequences of an accident previously evaluated will not be significantly affected. The ITS support systems ACTIONS continue to provide appropriate compensatory actions to mitigate an accident previously evaluated. Therefore, this change will not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change provides an allowance such that when a support system in the Technical Specifications is inoperable resulting in a supported system in the Technical Specifications being inoperable, only the ACTIONS of the support system must be followed. The change also requires an evaluation to be performed if a loss of safety function exists. This change will not physically alter the plant (no new or different type of equipment will be installed). The change also does not require any new or unusual operator actions. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

   The proposed change provides an allowance such that when a support system in the Technical Specifications is inoperable resulting in a supported system in the Technical Specifications being inoperable, only the ACTIONS of the support system

must be followed. The change also requires an evaluation to be performed to determine if a loss of safety function exists. The support system ACTIONS in the ITS have been structured to provide the appropriate preventative and compensatory measures when the support system is inoperable without reliance on the ACTIONS of the supported systems, or the support system ACTIONS explicitly direct entry into the supported systems ACTIONS. In addition, an evaluation is performed to determine if there has been a loss of safety function. If so, the ACTIONS for the specification associated with the loss of safety function are followed. As a result, the Technical Specifications continue to provide appropriate compensatory actions for inoperable equipment or variables and the margin of safety is not significantly reduced. Therefore, this change does not involve a significant reduction in a margin of safety.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES

SECTION 3.0, LCO AND SR APPLICABILITY, CHANGE L.4

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

> CTS 3.0.4 and CTS 4.0.4 are applicable in all MODES and prevent entry into a MODE or other specified condition in the Applicability unless the LCO or SR, respectively, is satisfied. ITS LCO 3.0.4 and ITS SR 3.0.4 are only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4 and do not restrict entry into a MODE or other specified condition in the Applicability during a normal shutdown.
>
> This change is acceptable because the applicable Specifications contain adequate measures to allow MODE changes while relying on Actions. A review of the technical specifications has determined that adequate controls are applied so that relying on Actions in this condition does not have an adverse effect on safety. This change has been designated as less restrictive as it restricts applicability of a current requirement to fewer conditions.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**
   The proposed change limits the prohibition on entering a MODE or condition specified in the Applicability when the LCO or SR is not met from all MODES to MODES 1, 2, 3, and 4. This change does not affect the probability of an accident. The Actions for Modes 5 and 6 have been reviewed and it was determined that MODE changes allowed under this change do not alter any initiators to accidents or mitigation of these accidents. Therefore, this change will not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

The proposed change limits the prohibition on entering a MODE or condition specified in the Applicability when the LCO or SR is not met from all MODES to MODES 1, 2, 3, and 4. This change will not physically alter the plant (no new or different type of equipment will be installed). Also, the change does not involve any new or unusual operator actions. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

The proposed change limits the prohibition on entering a MODE or condition specified in the Applicability when the LCO or SR is not met from all MODES to MODES 1, 2, 3, and 4. The margin of safety is not affected by this change because the Actions that are allowed under this change have been verified to contain adequate remedial measures to maintain the safety analysis assumptions. Therefore, the change does not involve a significant reduction in a margin of safety.

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGES

SECTION 3.0, LCO AND SR APPLICABILITY, CHANGE L.5

The North Anna Nuclear Power Station is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval." ITS SR 3.0.2 states, "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." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A.10 and DOC M.2.

This change is acceptable because the 25% Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions which must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Actions.

In accordance with the criteria set forth in 10 CFR 50.92, the Company has evaluated these proposed Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. **Does the change involve a significant increase in the probability or consequence of an accident previously evaluated?**

   The proposed change allows the Completion Time for periodic actions to be extended by 1.25. This change does not affect the probability of an accident. The length of time between performance of Required Actions is not an initiator to any accident previously evaluated. The consequences of any accident previously evaluated are the same during the Completion Time or during any extension of the Completion Time. As a result, the consequences of any accident previously evaluated are not increased. Therefore, this change will not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. **Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?**

   The proposed change allows the Completion Time for periodic actions to be extended by 1.25. This change will not physically alter the plant (no new or different type of equipment will be installed). Also, the change does not involve any new or unusual operator actions. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does this change involve a significant reduction in a margin of safety?**

   The proposed change allows the Completion Time for periodic actions to be extended by 1.25. The 25% extension allowance is provided for scheduling convenience and is not expected to have a significant effect on the average time between Required Actions. As a result, the Required Actions will continue to provide appropriate compensatory measures for the subject Condition. Therefore, the change does not involve a significant reduction in a margin of safety.