

SUMMARY OF CHANGES TO ITS SECTION 3.0

SUMMARY OF CHANGES TO ITS SECTION 3.0 - REVISION D

Source of Change	Summary of Change	Affected Pages
TSTF-8, Rev. 2	Previously incorporated, no changes affecting Revision D.	
TSTF-52, Rev. 3	Bases SR 3.0.2 is revised to provide a specific example regarding requirements of regulations that take precedence over the TS. Specifically, reference is provided to the "Primary Containment Leakage Testing Program " (See ITS 5.5.6). This example provides further clarification so that the Licensee understands that the TS in of itself cannot extend a test interval specified in the regulations .	ITS Bases mark-up pp B 3.0-12, insert B 3.0-12 Bases JFDs PA9 (Bases JFDs p 1 of 3), TA3 (Bases JFDs p 2 of 3) Retyped ITS Bases p B 3.0-14
TSTF-71, Rev. 2	Previously incorporated, no changes affecting Revision D.	
TSTF-104, Rev. 0	This change removes the additional discussion provided in LCO 3.0.4 with respect to the use of exceptions and provides the necessary discussion in the Bases. This change provides consistency with LCO 3.0.3 by moving the discussion of exceptions from the LCO to the Bases (Bases LCO 3.0.3, bottom of MU page B 3.0-4 and top of MU page 3.0-5 provides discussion of exceptions in the Bases). Furthermore, the change inserted into the Bases eliminates the repeated use of the phrase "Modes or other specified conditions in the Applicability" to increase clarity.	CTS mark-up, insert p 4 of 5 DOC A8 (DOCs p 3 of 8) ITS mark-up p 3.0-2 JFD TA1 (JFDs p 1 of 2) ITS Bases mark-up pp B 3.0-6, insert B 3.0-6 Bases JFD TA4 (Bases JFDs p 2 of 3) Retyped ITS p 3.0-2 Retyped ITS Bases p B 3.0-6
TSTF-122, Rev. 0	Bases LCO 3.0.2 is revised for clarity. Specifically, the original wording is confusing in that it begins to discuss inoperability of redundant equipment without introducing the topic. This topic of inoperable redundant equipment is more appropriate for the Bases of LCO 3.0.3, where an appropriate discussion already exists (see last sentence of second paragraph from bottom of ITS Bases MU page B 3.0 3). The proposed wording retains the intent while presenting the material in the appropriate context of LCO 3.0.2	ITS Bases mark-up p B 3.0-2 Bases JFD TA5 (Bases JFDs p 2 of 3) Retyped ITS Bases p B 3.0-2 Retyped ITS Bases p B 3.0-2
TSTF-165, Rev. 0	The Bases of LCO 3.0.5 is revised to make it consistent with the LCO 3.0.5. LCO 3.0.5 refers to "testing," the Bases for LCO 3.0.5 inconsistently uses the term "SRs" instead of "testing." The change addresses testing that is required to demonstrate operability that is not a surveillance (e.g., post maintenance testing required to demonstrate operability may not be a surveillance). This change does not modify the intent of the LCO and makes the Bases consistent with the LCO.	ITS Bases mark-up p B 3.0-7 Bases JFD TA6 (Bases JFDs p 2 of 3) Retyped ITS Bases pp B 3.0-6, B 3.0-7

SUMMARY OF CHANGES TO ITS SECTION 3.0 - REVISION D

Source of Change	Summary of Change	Affected Pages
TSTF-166, Rev. 0	ITS LCO 3.0.6 is revised to eliminate an inconsistency between LCO 3.0.6, the Safety Function Determination Program (SFDP), and the LCO 3.0.6 Bases. Specifically, as currently written, LCO 3.0.6 does not explicitly require an evaluation in accordance with the SFDP; rather it states that additional evaluations may be required. Both the SFDP and the LCO 3.0.6 Bases state that upon entry into LCO 3.0.6, an evaluation shall be made to determine if a loss of safety function exists. In addition, because LCO 3.0.6 states that the evaluation be done in accordance with the SFDP and the SFDP states that other appropriate actions may be taken, there is no need for the statement "additional ... limitations may be required" in LCO 3.0.6.	ITS mark-up p 3.0-3 JFD TA2 (JFDs p 1 of 2) Retyped ITS p 3.0-2
TSTF-208, Rev. 0	LCO 3.0.3 is revised by placing brackets around the time of "7" in LCO 3.0.3.a to allow a plant specific number to be provided for older BWRs. [REVIEWERS' NOTE: Physical brackets were not actually added to the markup, as they would immediately be removed, a process that would make the markup illegible. JFD TA3 applies TSTF and provides adequate attribution.]	JFD TA3 (JFDs p 1 of 2)
TSTF-273, Rev. 0	The Bases of LCO 3.0.6 is revised to provide clarification regarding the appropriate LCO to be entered for loss of function. The NUREGs were developed such that the Actions for a single support system inoperability would be addressed by that support system's Actions - without cascading to be the supported system; even if both trains of the support system were inoperable resulting from a loss of function. This intent is clarified in the LCO 3.0.6 Bases. Without this clarification, supported systems with a single support system (such as System X and System Y pump systems supported by a common source of water like a Water Tank System) would be declared inoperable when the support system is inoperable under the provisions of LCO 3.0.6 even though the support system Actions were designed to provide the appropriate response.	ITS Bases mark-up pp B 3.0-9, insert B 3.0-9 (II) Bases JFD TA7 (Bases JFDs p 2 of 3) Retyped ITS Bases p B 3.0-10
License Amendment 262	Amendment was made in response to enforcement discretion issues and applies ITS wording to CTS 3.0.D. Submittal markup and DOC are revised to reflect amendment.	CTS mark-up, p 3 of 5 DOC A8 (DOCs p 3 of 8)
License Amendment 267	Amendment restores CTS 3.0.G pertaining to Special Operations. This specification, which is analogous to ITS LCO 3.0.7, was deleted in Rev. B submittal, reflecting previous Amendment 241. Submittal markup and DOC are revised to reflect amendment.	CTS mark-up, p 5 of 5 DOC A13 (DOCs p 6 of 8)

ITS CONVERSION PACKAGE

SECTION 3.0

**LIMITING CONDITION FOR OPERATION (LCO)
APPLICABILITY SURVEILLANCE REQUIREMENT
(SR) APPLICABILITY**

JAFNPP IMPROVED TECHNICAL SPECIFICATION (ITS)

CONVERSION PACKAGE

Section 3.0

LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

Table of Contents

The markup package for each Specification contains the following:

**Markup of the current Technical Specifications (CTS);
Discussion of changes (DOCs) to the CTS;
No significant hazards consideration (NSHC) for each
less restrictive change (LX) to the CTS;
Markup of the corresponding NUREG-1433
Specification;
Justification of differences (JFDs) from the NUREG;
Markup of NUREG-1433 Bases;
Justification for differences (JFDs) from NUREG-1433
Bases; and
Retyped proposed Improved Technical Specifications
(ITS) and Bases.**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**MARKUP OF CURRENT TECHNICAL
SPECIFICATIONS (CTS)**

A1

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

JAFNPP

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

3. Limiting Conditions for Operation
3.0 General
Applicability:
 Applies to the general LCO requirements of Section 3.
Objective:
 To specify the general requirements applicable to each Limiting Condition for Operation listed in Section 3.
Specification: met

4. Surveillance Requirements
4.0 General
Applicability:
 Applies to the general surveillance requirements of Section 4.
Objective:
 To specify the general requirements applicable to each surveillance requirement in Section 4.
Specification: met

[LCO 3.0.1]

A2

A. Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for each specification. Conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7 or other.

[SR 3.0.1]

A. Surveillance Requirements shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for individual Limiting Condition for Operation unless otherwise stated in the individual Surveillance Requirements. A5

[LCO 3.0.2]

A3

B. Adherence to the requirements of the Limiting Condition for Operation and 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 unless otherwise stated. Except as provided in LCO 3.0.5 and LCO 3.0.6

[SR 3.0.2]

B. Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. M2

INSERT 302-1

INSERT 302-2

INSERT 302-3

[LCO 3.0.3]

A11

L1

C. In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in COLD SHUTDOWN within the following 2 hours unless corrective measures are completed that permit operation under the permissible ACTION or until the reactor is placed in an OPERATIONAL CONDITION (mode) in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specifications. A. Initiate action within 1 hour, Mode 2 in 9 hours, Mode 3 in 13 hours

[SR 3.0.1]

[SR 3.0.3]

C. Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.B, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified. A5

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

A4

Amendment No. 93, 158, 198

M1 30

INSERT 301-1

A5

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.

INSERT 302-1

M2

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

INSERT 302-2

L2

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

INSERT 302-3

A6

Exceptions to this Specification are stated in the individual Specifications.

JAFNPP

4.0 Continued

[SR 3.0.3]

That a Surveillance Requirement has not been performed. The ACTION 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 requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

A1

L3

A7

A5

<ADD 2nd & 3rd ¶ of SR 3.0.3>

D. Entry into an OPERATIONAL CONDITION (mode) shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to Operational Modes as required to comply with ACTION requirements or that are part of a shutdown of the plant.

met

A12

INSERT SR 304-1

[SR 3.0.4]

3.0 Continued

A8

[LCO 3.0.4]

Entry into an OPERATIONAL CONDITION (mode) or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION (mode) or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through OPERATIONAL CONDITIONS (modes) required to comply with ACTION requirements or that are part of a shutdown of the plant. Exceptions to these requirements are stated in the individual specifications.

INSERT 304-2

E. 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) are satisfied, the unit shall be placed in COLD SHUTDOWN within the following 24 hours. This specification is not applicable when in Cold Shutdown or Refuel Mode.

See ITS 38.1

F. Surveillance Requirements for inservice testing of components shall be applicable as follows:

1. Inservice testing of 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(f), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(f)(6)(i). The inservice testing and inspection program is based on an NRC approved edition of and addenda to, Section XI of the ASME Boiler and Pressure Vessel Code which is in effect 12 months prior to the beginning of the inspection interval.

See ITS 5.5.7

F. Equipment removed from service or declared inoperable to comply with required 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 3.0.5.

[LCO 3.0.5]

A9

INSERT 305-1

Amendment No. 83, 184, 198, 227, 241, 262

30a

<ADD LCO 3.0.6> A10

AMD # 262

TSTF-104

INSERT 304-1

<< NONE: Deleted in Revision D >>

INSERT 304-2

A8

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

INSERT SR304-1

A12

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

INSERT 305-1

A9

... 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0 Continued

[LCO 3.0.7]

Special Operations LCOs in Section 3.12 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 the Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into an OPERATIONAL CONDITION (mode) or other specified condition shall only be made in accordance with the other applicable specifications.

4.0 Continued

2. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice testing activities required by the Code and applicable Addenda shall be applicable as defined in Technical Specification 1.0.T.
3. The provisions of Specification 4.0.B are applicable to the frequencies specified in Technical Specification 1.0.T for performing inservice testing activities.
4. Performance of the above inservice testing activities shall be in addition to other specified Surveillance Requirements.
5. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

See ITS 5.5.7

JAFNPP

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ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**DISCUSSION OF CHANGES (DOCs) TO THE
CTS**

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Current Technical Specification (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 CTS 3.0.A states that the LCOs and Actions shall be applicable during the OPERATIONAL CONDITIONS (modes) specified for each specification. ITS LCO 3.0.1 replaces the CTS phrase "Limiting Conditions for Operation...shall be applicable..." with the phrase "LCOs shall be met..." This change is made to be consistent with the format of other LCO 3.0 Specifications and with the concept of an LCO being met. In addition ITS LCO 3.0.1 identifies specific exceptions to other LCO Applicabilities thus eliminating any interpretations that may be required, and avoiding any confusion. These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.
- A3 CTS 3.0.B states that the LCO is complied with if the Actions are completed (within the specified time interval) or if the LCO is restored prior to the time interval expiring. ITS LCO 3.0.2 rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. In addition ITS LCO 3.0.2 identifies specific exceptions to other LCO Applicabilities thus eliminating any interpretations that may be required, and avoiding any confusion. These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.
- A4 A phrase has been added to CTS LCO 3.0.C for clarity. ITS LCO 3.0.3 includes the phrase "LCO 3.0.3 is only applicable in MODES 1, 2, and 3." This phrase has been added since CTS provides no guidance in this area. No further ACTIONS would be required to be performed if the plant were already in MODE 4 or 5 since CTS LCO 3.0.C only requires the plant to be placed in MODE 4. This change constitutes editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and is administrative.

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

- A5 Two CTS Surveillance Requirements, 4.0.A and 4.0.C have been combined to form ITS SR 3.0.1. ITS SR 3.0.1 rewords the current requirements to be consistent with the format of other LCO 3.0 Specifications. ITS SR 3.0.1 also adds clarifying words specifying that "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." CTS implies that failure to meet the Surveillance means failure to meet the LCO, however ITS SR 3.0.1 provides this information in a clearer manner. This change constitutes editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.
- A6 CTS 4.0.B allows the Surveillance Frequency to be extended by 25% each Surveillance interval. ITS SR 3.0.2 rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications. ITS 3.0.2 also adds the sentence "Exceptions to this Specification are stated in the individual Specifications," to acknowledge the explicit use of exceptions in various Surveillances. The basic application of the 25% extension to routine Surveillances is maintained. These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.
- A7 When it is determined that a Surveillance Requirement has not been performed, CTS 4.0.C provides allowances for delay into the ACTIONS requirements for up to 24 hours for those specifications which include out of service times of less than 24 hours. This allowance has been modified as described in L1. CTS 4.0.C has been revised to explicitly state the required ACTIONS if the Surveillance is not performed within the delay period or if the Surveillance is performed within the delay period but it is not met. The second paragraph of ITS SR 3.0.3 requires the LCO to be immediately declared not met, and the applicable Condition(s) to be entered if the Surveillance is not performed within the delay period. The third paragraph requires these same actions when the Surveillance is performed within the delay period but is not met. Since the actions are implied in CTS 4.0.C, this change is considered administrative. This change is consistent with NUREG-1433, Revision 1.

**DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY**

- A8** CTS 3.0.D does not permit entry into a MODE or other specified condition when an LCO is not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Exceptions to these requirements are stated in the individual specifications. ITS LCO 3.0.4 rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications.

In addition, ITS LCO 3.0.4 states that the LCO is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3. A review of the current and proposed Specifications has been performed to determine the affects of this allowance on the current and proposed Specifications. The review has determined that this change does not provide any additional allowances to change MODES beyond those that currently exist, except where justified in individual Specifications (as described in the individual Specification's Discussion of Changes). These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.

- A9** CTS 3.0.F states that this LCO is an exception to LCO 3.0.B (ITS 3.0.2). ITS LCO 3.0.5 includes these requirements and also adds clarifying words specifying that the exception to LCO 3.0.2 is for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY. This clarification eliminates any interpretations that may be required, and avoids any confusion. These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.
- A10** ITS LCO 3.0.6 is added to provide guidance regarding the appropriate actions to be taken when a single inoperability (e.g., a support system) also results in the inoperability of one or more related systems (e.g., supported system(s)). The existing Technical Specifications and various NRC guidance documents have not provided a consistent approach to the combined support/supported inoperability.

- Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination)

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

indicates an intent/interpretation consistent with the proposed LCO 3.0.6 - without the necessity of also requiring the additional actions of a Safety Function Determination Program. That is, only the inoperable support system actions need be taken.

- Guidance provided by the NRC in their April 10, 1980, letter to all Licensees regarding the definition of Operability and the impact of a support system on the remainder of the Technical Specifications, indicates a similar philosophy of not taking actions for the inoperable supported equipment. However, in this case, additional actions similar to the proposed Safety Function Determination Program actions, were addressed and required.
- Generic Letter 91-18 and a literal reading of the existing Standard Technical Specifications provide the interpretation that failure to perform a required function, even as a result of an inoperable Technical Specification support system, requires all associated actions be taken.
- Certain existing specifications contain actions such as: Declare the supported system inoperable and take the Actions of its specification. In many cases the supported system would already be considered inoperable. The implication of this presentation is that the actions of the inoperable supported system would not have been taken without the specific action to do so.

Considering the history of disagreement and misunderstandings in this area, the ISTS were developed with Industry input and approval of the NRC to include ITS LCO 3.0.6. Since its function is to clarify existing ambiguities and maintain actions within the realm of previous interpretations, this new provision, consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, is deemed to be administrative in nature.

- A11 A requirement has been added to CTS 3.0.C (ITS LCO 3.0.3) which requires entry into LCO 3.0.3 when directed by the associated ACTIONS. This requirement is not included in the CTS since no specification explicitly directs entry into CTS 3.0.C. Since the ITS also uses this method of entry into LCO 3.0.3 this statement must be included. Changes to Specifications to explicitly require direct entry into LCO 3.0.3 (e.g., ITS 3.5.1) in the ITS if certain conditions are not met, are discussed in the Discussion of Changes for the specific Specification. Therefore,

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

this change constitutes a presentation preference consistent to NUREG-1433, Revision 1 and is considered administrative.

- A12 CTS 4.0.D does not permit entry into a MODE or other specified condition when an LCO's Surveillances have not been met within the applicable interval or as otherwise stated. ITS SR 3.0.4 rewords the current requirement to be consistent with the format of other LCO 3.0 Specifications.

ITS SR 3.0.4 also adds the phrase "or that are part of a shutdown of the unit," for clarity such that the provisions of ITS SR 3.0.4 do not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with Actions or are part of a shutdown. This phrase has been added following the intent of NRC Generic Letter 87-09 to clarify that the provisions of proposed SR 3.0.4 do not prevent passage to or through lower MODES or other specified conditions to comply with Actions. This clarification also ensures that a unit shutdown may proceed even if not directed by Action provisions. The change is considered to be acceptable since for Technical Specification conditions that ultimately require a shutdown through some MODES in the Applicability, any early shutdown (prior to the absolutely required shutdown, e.g., day 2 of an allowed 7 day restoration) is considered to be not precluded by CTS 3.0.D. For other plant shutdowns, the shutdown would normally be performed with a full complement of safety systems OPERABLE (as opposed to a shutdown required by Technical Specifications). The Bases of SR 3.0.4; which states that the provisions of this Specification should 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. Therefore, for normal plant shutdowns the change is not considered to provide any added flexibility.

In addition, ITS SR 3.0.4 states that the SR is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3. This phrase has been added since CTS 4.0.D provides no guidance in this area. The change eliminates the restrictions of the SR when in MODES 4 or 5. Specific restrictions on MODE changes or Required Actions are included in the individual LCOs and discussed in the appropriate DOCs. These changes constitute editorial rewording, and presentation preferences consistent with the BWR/4 ISTS, NUREG-1433, Revision 1, and are administrative.

DISCUSSION OF CHANGES
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AND # 267

A13 Not Used.

TECHNICAL CHANGES - MORE RESTRICTIVE

M1 CTS 3.0.C requires the unit be placed in COLD SHUTDOWN (MODE 4) within 24 hours if the LCO or action requirements cannot be satisfied because of circumstances in excess of those addressed in the Specifications. ITS LCO 3.0.3 requires that the plant take action within 1 hour to initiate the shutdown, be in MODE 2 in 9 hours, be in MODE 3 in 13 hours, and be in MODE 4 in 37 hours (L1). This change requires the plant to perform the shutdown in a controlled manner which will reduce the chances for a plant transient which could challenge safety systems.

Since this change requires the plant to take action within 1 hour and to be at interim conditions, MODE 2 in 9 hours and MODE 3 in 13 hours, this change imposes additional time restraints on operations and therefore, is more restrictive. The times are consistent with NUREG-1433, Revision 1 expect for the time to be in MODE 2. An additional two hours provided for the time to be in MODE 2 has been specified based on operating limitations associated with reaching this condition and current requirements to be in MODE 2 in another specification (Reactor Protection System). This change has no adverse impact on safety.

M2 CTS 4.0.B does not address Frequencies specified as once. ITS SR 3.0.2 includes the phrase "For Frequencies specified as "once," the above interval extension does not apply." This is because the interval extension concept is based on scheduling flexibility for repetitive performance and these Surveillances are not repetitive in nature and essentially have no interval as measured from the previous performance. This change precludes the ability to extend these performances consistent with NUREG-1433, Revision 1. Since, CTS 4.0.B can be interpreted to apply the extension to all Surveillances, stating that the extension does not apply imposes additional requirements on operations and therefore, is more restrictive. This change has no adverse impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

- L1 CTS 3.0.C requires the unit to be placed in COLD SHUTDOWN (MODE 4) within 24 hours if the LCO or action requirements cannot be satisfied because of circumstances in excess of those addressed in the Specification. ITS LCO 3.0.3 allows 37 hours to be in MODE 4 which includes the requirements (M1) to initiate the shutdown within 1 hour, be in MODE 2 within 9 hours, and be in MODE 3 in 13 hours. This change is considered less restrictive since the time to get to MODE 4 has increased by 13 hours (37 versus 24 hours). This change is acceptable since the compensating actions added in accordance with M1 and this extended time to reach MODE 4 will ensure a more continuous reduction in power and reactor coolant temperature which is within the specified maximum cooldown rate and within the capabilities of the plant. This reduces thermal stresses on components of the Reactor Coolant System and also reduces the chances for a plant transient which could challenge safety systems. This change is consistent with NUREG-1433, Revision 1.
- L2 CTS 4.0.B has had the following sentence added, "If a Completion Time requires periodic performance on a "once per..." basis, the above Frequency extension applies to each performance after the initial performance." ITS SR 3.0.2 includes this statement which provides the consistency in scheduling flexibility for all performances of periodic requirements, whether they are Surveillances or Required Actions. The intent remains to perform the activity, on the average, once during each specified interval. This change is consistent with NUREG-1433, Revision 1.
- L3 When it is determined that a Surveillance was not performed, CTS 4.0.C allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage time limits of the ACTION requirements are less than 24 hours. ITS SR 3.0.3 continues to allow a delay, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance Frequency, whichever is less. This change is less restrictive since the delay will now apply to any Surveillance instead of those specifications with ACTION requirements of less than 24 hours. The current dependance to the ACTION allowable outage time is considered not to be necessary since the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

DISCUSSION OF CHANGES
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - RELOCATIONS

None

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES**

NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change identified as "Technical Changes - Less Restrictive" and has determined that it does not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that the proposed change does not involve a significant hazards consideration are discussed below.

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

This change allows a more gradual plant shutdown path than allowed by CTS 3.0.C. Currently the plant has to be in Cold Shutdown within 24 hours. ITS LCO 3.0.3 requires the plant to initiate action within 1 hour to place the plant in Mode 2 (Startup/Hot Standby) within 9 hours, Mode 3 (Hot Shutdown) within 13 hours (M1) and Mode 4 (Cold Shutdown) within 37 hours. The overall time to Cold Shutdown is increased by 13 hours by the proposed change. The proposed changes will require the shutdown to proceed in a more orderly and controlled manner. This reduces thermal stresses on components of the reactor coolant system and the potential for a plant transient that could challenge safety systems under conditions to which this Specification applies. This relaxation is also acceptable based on the small probability of an event requiring the inoperable Technical Specification structures, systems and components (SSCs) to function or variables to be maintained and the desire to minimize transients. LCO 3.0.3 is only entered if the Action and Completion Time are not met and no other condition applies or if the condition of the plant is not specifically addressed by the associated actions. It is the intent of the Technical Specifications to provide action provisions, where possible, to avoid the use of LCO 3.0.3 and subsequent plant shutdown. The proposed changes to the overall shutdown Completion Times have no impact on any analyzed event. The change will not allow continuous operation when SSCs are inoperable or parameter limits are not met. In addition, the consequences of an event occurring during the proposed shutdown Completion Times are the same as the consequences of an event occurring during the existing Completion Times. The proposed change to extend the time required to reach MODE 4 is less restrictive than present provisions; however, ITS LCO 3.0.3 will provide a more orderly plant shutdown sequence without involving a significant increase in the probability or consequences of an accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 CHANGE (contined)

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

The proposed change will not alter the plant configuration (no new or different type of equipment will be installed or removed) nor will the operation of the plant change. The change still ensures the plant is placed in a specified Mode or condition in a timely manner. Therefore, the proposed change will 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 relaxation in the time allowed to reach MODE 4 in accordance with proposed LCO 3.0.3 represents a relaxation over the provisions in CTS 3.0.C. However, this relaxation is acceptable based on the small probability of an event requiring the inoperable Technical Specification components to function or variables to be maintained and the desire to minimize transients. LCO 3.0.3 is only entered if the Action and Completion Time are not met and no other condition applies or if the condition of the plant is not specifically addressed by the associated ACTIONS. It is the intent of the Technical Specifications to provide action provisions, where possible, to avoid the use of LCO 3.0.3 and subsequent plant shutdown. This change will not affect a margin of safety because it has no impact on the safety analysis assumptions. The shutdown Completion Times specified in CTS 3.0.C or in ITS LCO 3.0.3 are not assumed in any analyzed accidents. This proposed change and the compensatory actions added in accordance with M1 (to initiate action within 1 hour to place the plant in MODE 2 in 9 hours and MODE 3 in 13 hours) will enhance plant safety by requiring a more orderly plant shutdown while still requiring the plant to reach MODE 4 (Cold Shutdown) within 13 hours of present provisions. Therefore, the change will not involve a significant reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L2 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change identified as "Technical Changes - Less Restrictive" and has determined that it does not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that the proposed change does not involve a significant hazards consideration are discussed below.

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

The application of the 25% extension to Required Action Completion Times which have a specified frequency on a periodic "once per" basis has been determined to not significantly degrade the reliability that results from performing the surveillance at a specified frequency. As stated in Generic Letter 87-09, "The vast majority of surveillances do in fact demonstrate that systems or components are operable." Therefore, the proposed 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 possibility of a new or different kind of accident from any accident previously evaluated is not created because the proposed change does not introduce a new mode of plant operation and does not involve physical modification to the plant.

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

The application of the 25% extension to Required Action Completion Times which have a specified frequency on a periodic "once per" basis has been determined to not significantly degrade the reliability that results from performing the surveillance at a specified frequency. As stated in Generic Letter 87-09, "The vast majority of surveillances do in fact demonstrate that systems or components are operable." Therefore, the proposed change does not involve a significant reduction in the margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L3 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change identified as "Technical Changes - Less Restrictive" and has determined that it does not involve a significant hazards consideration. This determination has been performed in accordance with the criteria set forth in 10 CFR 50.92. The bases for the determination that the proposed change does not involve a significant hazards consideration are discussed below.

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

When it is determined that a Surveillance was not performed, CTS 4.0.C allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage time limits of the ACTION requirements are less than 24 hours. ITS SR 3.0.3 continues to allow a delay, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. Changes to the times permitted to perform a Surveillance is not considered as an initiator of any design basis accident. Therefore, this change does not significantly increase the probability of an accident previously analyzed. The most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. The added time allowance is not considered to cause the component or subsystem to become inoperable or parameter to drift out of compliance. Therefore, the consequences of an event occurring during this extended time period will be bounded by the current allowances. Therefore, this change does not significantly increase the 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 possibility of a new or different kind of accident from any accident previously evaluated is not created because the proposed change does not introduce a new mode of plant operation and does not involve physical modification to the plant.

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

When it is determined that a Surveillance was not performed, CTS 4.0.C allows ACTION requirements to be delayed for up to 24 hours to permit completion of the Surveillance if the allowable outage time limits of the ACTION requirements are less than 24 hours. ITS SR 3.0.3 continues to allow a delay, from the time of discovery, up to 24 hours or up to

NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 3.0 - LCO AND SR APPLICABILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L3 CHANGE (continued)

the limit of the specified Frequency, whichever is less. The most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. The added time allowance is not considered to cause the component or subsystem to become inoperable or a parameter to drift out of compliance. Therefore, the consequences of an event occurring during this extended time period will be bounded by the current allowances. Therefore, this change does not result in a significant reduction in a margin of safety.

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IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**MARKUP OF NUREG-1433, REVISION 1
SPECIFICATION**

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

[3.]
[3.0]

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.

[3.0.A]

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.

[3.0.B]

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:

[3.0.C]

- a. MODE 2 within 2 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

plant PA1
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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, and 3.

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

[3.0.D]

(continued)

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3.0 LCO APPLICABILITY

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~~.

PAI plant

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.~~

[3.0.D]

TAI

TSF-104

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

Reviewer'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, and 3. 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.

XI

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.

[3.0.F]

(continued)

3.0 LCO APPLICABILITY (continued)

[A10]

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,

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~~additional evaluation and limitations may be required~~ in accordance with Specification 5.5.12, "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.

shall be performed

TSF-166

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.

[3.0.6]

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

[4]
[4.0]

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1

[4.0.A]

[P.O.C]

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.

SR 3.0.2

[4.0.B]

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

[4.0.C]

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)

3.0 SR APPLICABILITY

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

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.

[4.0.0]

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

X1

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, and 3. 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.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**JUSTIFICATION FOR DIFFERENCES (JFDs)
FROM NUREG-1433, REVISION 1**

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 3.0 - LCO AND SR APPLICABILITY

RETENTION OF EXISTING REQUIREMENT (CLB)

None

PLANT-SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

PA1 Editorial changes have been made for enhanced clarity or to correct a grammatical/typographical error.

PLANT-SPECIFIC DIFFERENCE IN THE DESIGN (DB)

None

DIFFERENCE BASED ON AN APPROVED TRAVELER (TA)

- TA1 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 104, Revision 0, have been incorporated into the revised Improved Technical Specifications.
- TA2 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 166, Revision 0, have been incorporated into the revised Improved Technical Specifications.
- TA3 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 208, Revision 0, have been incorporated into the revised Improved Technical Specifications.

(see TSTF # in TAx)

DIFFERENCE BASED ON A SUBMITTED, BUT PENDING TRAVELER (TP)

None

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 3.0 - LCO AND SR APPLICABILITY

DIFFERENCE FOR ANY REASON OTHER THAN THE ABOVE (X)

- X1 The bracketed "Reviewer's Note" has been deleted. This information is for the NRC Reviewer to be keyed in to what is needed to meet this requirement. This is not meant to be retained in the final version of the plant specific information.
- X2 ITS LCO 3.0.3.a has been revised consistent with JAFNPP operating limitations and current licensing requirements. Due to JAFNPP operating limitations, imposed by a restrictive exclusion zone as a result of thermal-hydraulic stability option 1D, the requirement to be in MODE 2 within 7 hours is revised to MODE 2 within 9 hours. The CTS 3.0.C (M1) Completion Time of 9 hours is consistent with current operating practice established in CTS Table 3.1-1 Note 3.B, to reduce power and place the Mode switch in the Startup position within 8 hours.

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IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

MARKUP OF NUREG-1433, REVISION 1, BASES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

in Sections 3.1 through 3.10 (PA1)

BASES

LCOs LCO 3.0.1 through LCO 3.0.7 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).

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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

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REVISION D

BASES

LCO 3.0.2
(continued)

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PA2

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 3.4.0, "RCS Pressure and Temperature (P/T) Limits."

PA3

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TA5

Additionally, if intentional entry into ACTIONS

, alternatives

may

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/divisions 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.

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PA2
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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)

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 PAZ
plant
- 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.

(continued)

BASES

plant PA2

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.

PA2
plant

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 4 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 4, or other applicable MODE, is not reduced. For example, if MODE 2 is reached in 2 hours, then the time allowed for reaching MODE 3 is the next 11 hours, because the total time for reaching MODE 3 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, and 3, 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 4 and 5 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, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

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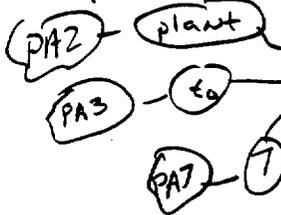
Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.4, "Spent Fuel Storage Pool Water Level." LCO 3.7.4 has an Applicability of "During movement of irradiated fuel

7 PA7

(continued)

BASES

LCO 3.0.3
(continued)



assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.9 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 3.7.8 ~~is~~ "Suspend movement of irradiated fuel assemblies in the spent 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)

BASES

LCO 3.0.4
(continued)

PAZ plant

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 ~~UPDT~~ 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. X4

INSET B 3.0-5

TA4

LCO 3.0.4 is only applicable when entering 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 MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual specifications sufficiently define the remedial measures to be taken. X1

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. X1

PA6

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, either 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

PA3

LCB 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

(continued)

TSF-104

TSTF-104

INSERT B 3.0-5

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.

BASES

(continued)

of **required testing** **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.

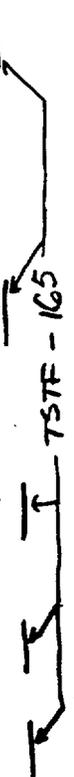
An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the **SRS**.

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.

TAG

required testing to demonstrate OPERABILITY

required testing



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 plant 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.

PA3

LCO 3.0.6

S
S
PA3

When a support system is inoperable and there is an LCO

(continued)

BASES

(continued)

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 plant is maintained in a safe condition in the support system's Required Actions. P43

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 5.5.12, "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 division checks to identify a loss of safety function for those support systems that support safety systems are required. The cross division check verifies that the supported systems of the redundant OPERABLE support 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 TA1

INSERT
B 3.0.2

(continued)

TAI

INSERT B 3.0-2

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

X2

- 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)

edit edit edit

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.

PAS

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 in turn is 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.

BASES

75TF-273

LCO 3.0.6 (continued) the LCO in which the loss of safety function exists are required to be entered.

TA1

INSERT B 3.0-3

INSERT B 3.0-6

TA7

LCO 3.0.7

PA2

plant

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. Special Operations LCOs in Section 3.10 allow specified 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.

plant

PA2

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO ACTIONS may direct the other LCO'S ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO'S requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

35

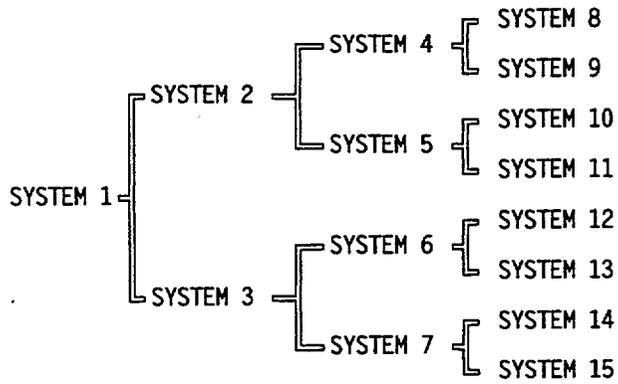
PA3

TAI

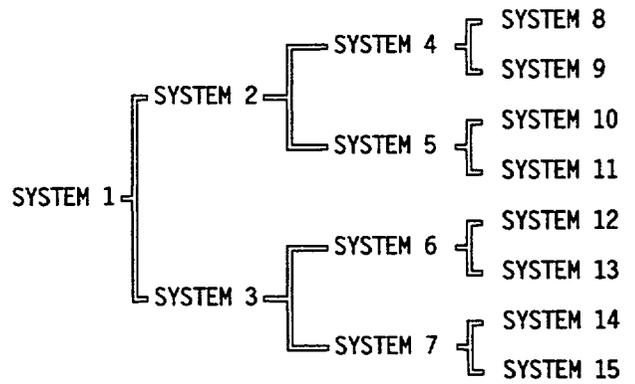
INSERT B 3.0-3

EXAMPLES

DIVISION
TRAIN A



DIVISION
TRAIN B) - IPAB



INSERT B 3.0-6

TSTF - 273

This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations is being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. 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 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

in Sections 3.1 through 3.10 PA1

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.

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 to be not met between required Surveillance performances.

PA2
plant

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 Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.

INSERT
B 3.0-4 →

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.

TA2

(continued)

TAZ

INSERT B 3.0-4

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 UNST 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.

PAZ
-work

-work
PAZ
plant

PA4

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at 800 psia. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psia to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

X3

-work
PAZ

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.,

(continued)

BASES

SR 3.0.2
(continued)

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

TA3
INSERT
B 3.0-7

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

(continued)

TSIF-52

INSERT B 3.0-7

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

BASES

SR 3.0.3
(continued)

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 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

(continued)

BASES

SR 3.0.3 (continued) 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~~ plant PA2.

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.

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~~ SR 3.0.4 shall not prevent changes in MODES PA3.

PA5
ON equipment that is inoperable

PA3

SR

(continued)

BASES

SR 3.0.4
(continued)

or other specified conditions in the Applicability that result from any ~~UNIT~~ shutdown. plant PAZ

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency. or 5 X4

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

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**JUSTIFICATION FOR DIFFERENCES (JFDs)
FROM NUREG-1433, REVISION 1, BASES**

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS BASES: 3.0 - LCO AND SR APPLICABILITY

RETENTION OF EXISTING REQUIREMENT (CLB)

None

PLANT-SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

- PA1 ITS LCO 3.0.1 and SR 3.0.1 Applicabilities only apply to Specifications in Sections 3.1 through 3.10; they do not apply to specifications in Chapter 4.0 and 5.0 unless specifically stated in those specifications. Therefore this statement has been added for clarity.
- PA2 Changes have been made (additions, deletions, and/or changes to the NUREG) to reflect the plant specific system/structure/component nomenclature, equipment identification or description.
- PA3 Editorial changes have been made for enhanced clarity or to correct a grammatical/typographical error.
- PA4 The paragraphs in ITS SR 3.0.1 and SR 3.0.3 have been joined for continuity and to complete the thought process.
- PA5 The words, "on equipment that is inoperable", have been added to ITS SR 3.0.4 for clarity. Failing to perform the Surveillance(s) within the specified Frequency does not result in an ITS SR 3.0.4 restriction if the equipment is already inoperable.
- PA6 This LCO 3.0.4 bracketed information has been deleted since the JAFNPP ITS does not include this option.
- PA7 The proper LCO number has been added.
- PA8 JAFNPP does not use the term "train", therefore the additions added in accordance with TSTF-71 have been modified as required.
- PA9 Not used.

PLANT-SPECIFIC DIFFERENCE IN THE DESIGN (DB)

None

JAFNPP

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS BASES: 3.0 - LCO AND SR APPLICABILITY

DIFFERENCE BASED ON AN APPROVED TRAVELER (TA)

- (see TSTF # in TA_x)
- TA1 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 71, Revision 2, have been incorporated into the revised Improved Technical Specifications.
 - TA2 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 8, Revision 2, have been incorporated into the revised Improved Technical Specifications.
 - TA3 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 52, Revision 3, have been incorporated into the revised Improved Technical Specifications.
 - TA4 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 104, Revision 0, have been incorporated into the revised Improved Technical Specifications.
 - TA5 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 122, Revision 0, have been incorporated into the revised Improved Technical Specifications.
 - TA6 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 165, Revision 0, have been incorporated into the revised Improved Technical Specifications.
 - TA7 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 273, Revision 2, have been incorporated into the revised Improved Technical Specifications.

DIFFERENCE BASED ON A SUBMITTED, BUT PENDING TRAVELER (TP)

None

DIFFERENCE FOR ANY REASON OTHER THAN THE ABOVE (X)

- X1 The paragraph in ITS LCO 3.0.4 has been moved consistent with change package BWR-26, C.1. This change was incorrectly inserted in the wrong position when NUREG-1433, Revision 1 was promulgated.

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS BASES: 3.0 - LCO AND SR APPLICABILITY

- X2 ITS LCO 3.0.6 Insert B 3.0-2, provided in TSTF-71, Rev. 1, has been revised to include the sentence originally included in TSTF-71, Rev. 0. The exclusion of this sentence was identified as a typographical error and is addressed by TSTF-71, Rev. 2.
- X3 ITS SR 3.0.1 has been revised to reflect the value of ≥ 800 psig consistent with ITS 3.1.4 (M6).
- X4 The Bases for LCO 3.0.4 and SR 3.0.4 has been revised to reflect the possibility to enter MODE 2 from MODE 5 instead of from just MODES 3 or 4. The plant can have the Reactor Mode Switch in Refuel and complete the tensioning of all reactor vessel head closure bolts and based on Table 1.1-1 the plant will be immediately in MODE 2 without passing into MODE 3 or 4. Therefore, this modification simply corrects the Bases to reflect all possible ways of entering MODE 2.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 3.0

**LIMITING CONDITION FOR OPERATION
(LCO) APPLICABILITY**

**SURVEILLANCE REQUIREMENT (SR)
APPLICABILITY**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS) AND BASES**

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 plant 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 plant, as applicable, in:

- a. MODE 2 within 9 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 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, and 3.

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.

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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 plant.

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, and 3.

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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 5.5.12, "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.

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3.0 LCO APPLICABILITY (continued)

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only 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.

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

(continued)

3.0 SR APPLICABILITY

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

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 plant.

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

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 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 plant 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 plant 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)

BASES

LCO 3.0.2
(continued)

ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the plant 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 Condition no longer exists. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.9, "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. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/divisions 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 plant 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)

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 plant 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 plant. 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 plant 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 plant 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 plant, 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. A plant shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any

(continued)

BASES

LCO 3.0.3
(continued)

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 plant to be in MODE 4 when a shutdown is required during MODE 1 operation. If the plant 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 4, or other applicable MODE, is not reduced. For example, if MODE 2 is reached in 2 hours, then the time allowed for reaching MODE 3 is the next 11 hours, because the total time for reaching MODE 3 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, and 3, 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 4 and 5 because the plant 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, or 3) 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 plant shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the plant. An example of this is in LCO 3.7.7, "Spent Fuel Storage Pool Water Level." LCO 3.7.7 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.7 are not met while in

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BASES

LCO 3.0.3
(continued)

MODE 1, 2, or 3, there is no safety benefit to be gained by placing the plant in a shutdown condition. The Required Action of LCO 3.7.7 to "Suspend movement of irradiated fuel assemblies in the spent 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 plant in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

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

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BASES

LCO 3.0.4
(continued)

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.

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

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
- b. The OPERABILITY of other equipment.

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BASES

LCO 3.0.5
(continued)

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.

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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's 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 plant is maintained in a safe condition are specified in the support systems' 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' LCO's Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the plant 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 5.5.12, "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 division checks to identify a loss of safety function for those support systems that support safety systems are required. The cross division 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 (EXAMPLE B3.0.6-1); or
- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable (EXAMPLE B3.0.6-2); or

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(continued)

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 B3.0.6-3).

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EXAMPLE B3.0.6-1

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

EXAMPLE B3.0.6-2

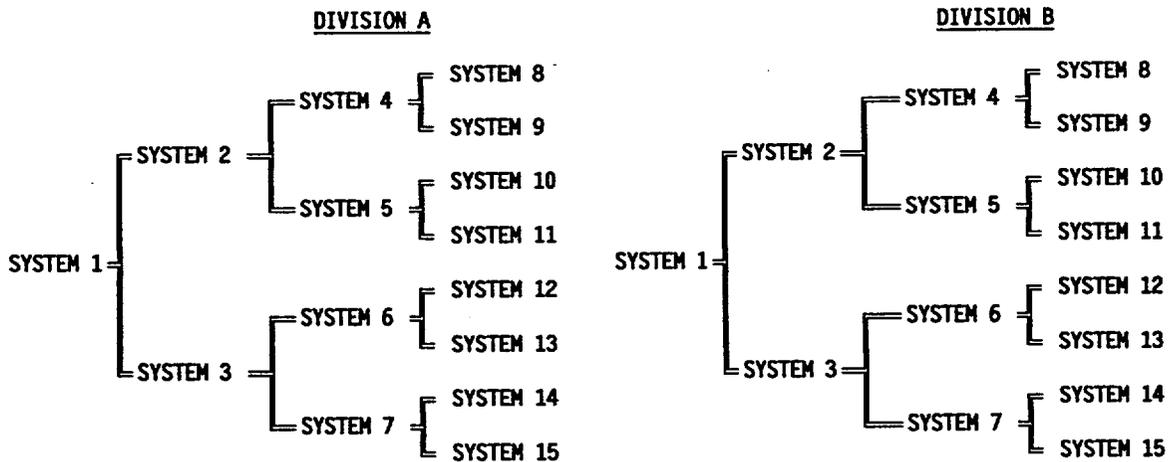
If System 2 of Division A is inoperable, and System 11 of Division B is inoperable, a loss of safety function exists in System 11 which in turn is supported by System 5.

EXAMPLE B3.0.6-3

If System 2 of Division A is inoperable, and System 1 of Division 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.

EXAMPLES



(continued)

BASES

LCO 3.0.6
(continued)

This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations is being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. 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 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 plant. These special tests and operations are necessary to demonstrate select plant performance characteristics, to perform special maintenance activities, and to perform special evolutions. Special Operations LCOs in Section 3.10 allow specified 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.

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BASES

**LCO 3.0.7
(continued)**

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

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 in Sections 3.1 through 3.10 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.

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 to be not met between required Surveillance performances.

Surveillances do not have to be performed when the plant 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 Special Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.

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.

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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-work 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-work testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary plant 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. Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at ≥ 800 psig. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 3.1.4.3 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 800 psig to perform other necessary testing.
- b. High pressure coolant injection (HPCI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPCI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post-work testing.

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.

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BASES

**SR 3.0.2
(continued)**

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. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is the Primary Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the 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.

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(continued)

BASES (continued)

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 plant conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified plant 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

(continued)

BASES

**SR 3.0.3
(continued)**

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 plant.

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.

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, on equipment that is inoperable, 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.

(continued)

BASES

**SR 3.0.4
(continued)**

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 SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any plant 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, 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 3 from MODE 4, MODE 2 from MODE 3, 4, or 5, 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 MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.
