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Energy to Serve Your WorldSM

December 26, 2001

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50-364

NEL-01-0334

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

Joseph M. Farley Nuclear Plant
Request For Technical Specification Changes
Deletion of LCO 3.6.1, Condition A and
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Southern Nuclear Operating Company (SNC) proposes to amend the Farley Nuclear Plant (FNP) Technical Specifications (TS), Appendix A to Operating License(s) NPF-2 and NPF-8. This TS amendment adds new LCO 3.0.8, based on TSTF-372. If approved, this change will allow a delay time, consistent with the delay time that existed prior to the conversion to the Improved Technical Specifications (ITS), before entering a TS Limiting Condition for Operation (LCO) for a supported system. Adoption of the proposed LCO 3.0.8 eliminates the need for LCO 3.6.1 Condition A, which this proposed change would delete. In addition, editorial changes are made to headers for internal consistency.

As part of the conversion to the ITS, the former TS requirements for snubbers and many other support systems were relocated to the Technical Requirements Manual (TRM) or other licensee controlled documents based on the fact that the TS requirements did not meet any of the four criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in the ITS. The removal of these requirements from the TS was classified as a relocation as opposed to a more restrictive or less restrictive change. The NRC approved the relocation without restriction. Therefore, it was intended that when a non-Technical Specifications support system could not perform the required safety function(s) for a system that is required to be OPERABLE by the TS, the licensee controlled document requirements for the support system would be invoked before the system TS LCO would become applicable. Should the actions of the licensee controlled document requirements for the support system not be completed within the allocated time, the system supported would be declared inoperable and the Conditions and Required Actions for that system followed. Recent NRC guidance has challenged this position, making clarification necessary.

Enclosure 1 provides a basis for the proposed changes. Enclosure 2 provides the basis for a determination that the proposed changes do not involve significant hazards considerations pursuant to 10 CFR 50.92. Enclosure 3 provides a markup of the proposed changes to the TS. Enclosure 4 provides the clean typed version of proposed changes to the TS. Enclosures 5 and 6

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contain markups and clean typed copies of the associated TS Bases changes. The Bases changes are submitted for information only and will be approved in accordance with the Farley Bases Control Program.

SNC requests an approval date of July 31, 2002 for this proposed license amendment to support the Unit 2 fall outage.

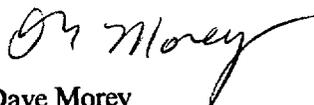
SNC has reviewed the proposed amendment pursuant to 10 CFR 50.92 and determined that it does not involve a significant hazards consideration. In addition, there is no significant increase in the amounts of effluents that may be released offsite, and there is no significant increase in individual or cumulative occupational radiation exposure. Consequently, the proposed amendment satisfies the criteria of 10 CFR 51.22 for categorical exclusion from the requirements for an environmental assessment and the human environment is not affected by this amendment.

A copy of the proposed changes has been sent to Dr. D. E. Williamson, the Alabama State Designee, in accordance with 10 CFR 50.91(b)(1).

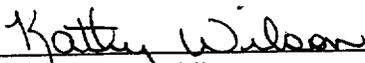
Mr. D. N. Morey states that he is a vice president of SNC, and is authorized to execute this oath on behalf of SNC and that, to the best of his knowledge and belief, the facts set forth in this letter and enclosures are true.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY


Dave Morey

Sworn to and subscribed before me this 26th day of December 2001



Notary Public

My Commission Expires: 6-4-2005

WAS/kaw: LCO308_NRC.doc

Enclosures:

1. Basis for the TS Change
2. 10 CFR 50.92 Evaluation
3. Marked-Up Technical Specification Pages
4. Clean Typed Technical Specification Pages
5. Marked-Up Technical Specification Bases Pages
6. Clean Typed Technical Specification Bases Pages

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U. S. Nuclear Regulatory Commission

cc: Southern Nuclear Operating Company
Mr. L. M. Stinson, General Manager - Farley

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. F. Rinaldi, Licensing Project Manager – Farley

U. S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. T. P. Johnson, Senior Resident Inspector – Farley

Alabama Department of Public Health
Dr. D. E. Williamson, State Health Officer

Enclosure 1

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

Basis for the TS Change

Enclosure 1

Joseph M. Farley Nuclear Plant Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems Technical Specification Changes

Basis for the TS Change

Background

As part of the conversion to the Improved Technical Specifications (ITS), the former Technical Specifications (TS) requirements for snubbers and many other support systems were relocated to the Technical Requirements Manual (TRM) or other licensee controlled documents. The conversion submittal identified the old TS requirements as candidates for relocation based on the fact that the TS requirements did not meet any of the four criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in the ITS. The removal of these requirements from the TS was classified as a relocation as opposed to a more restrictive or less restrictive change. The NRC approved the relocation without placing any restriction on the use of the relocated requirements. Therefore, it was intended that when a non-TS support system could not perform the required safety function(s) for a system that is required to be OPERABLE by the TS, the licensee controlled document requirements for the support system would be invoked before the system TS LCO would become applicable. For example, if a snubber was determined to not meet the licensee controlled documents requirements, it would need to be either restored or replaced with a known working snubber within 72 hours, and an engineering evaluation would also need to be performed for the attached component within that same 72 hour period. If these actions were not completed within the allocated time, the system supported by the snubber would be declared inoperable and the Conditions and Required Actions for that system followed.

During conversion to the ITS, numerous discussions were held regarding the loss of existing allowances for degraded containment structural integrity when TS requirements were relocated to Programs. A Farley-specific change was made to LCO 3.6.1 to retain the existing allowance. This provided for restoring the structural integrity of containment to within limits, if a degraded condition was identified through structural integrity testing, prior to declaring containment inoperable. This was a deviation from the Improved Standard Technical Specifications (ISTS) found in NUREG 1431. Adoption of new LCO 3.0.8 enables the deletion of LCO 3.6.1 Condition A, making the Farley TS consistent with the ISTS.

Finally, as a result of format changes that were made as part of the conversion, some inconsistencies were introduced. Editorial changes have been made to address these inconsistencies.

Need For Change

In a July 9, 1999 letter from the NRC to Duke Power, the NRC agreed with the below position:

LCO 3.0.6 only applies to those support systems which have their own TS. For support systems which are not in TS, when a supported system is made inoperable due to a non-TS support system being inoperable, the TS conditions and required actions for the supported system are required to be immediately entered.

At the Winter 2000 Snubber Users Group (SNUG) meeting, Dr. Arnold Lee of the NRC presented the following position.

The NRC Technical Specification Branch has taken the position that when a snubber is removed for testing, the licensees are bound by TS LCOs 3.0.2 and 3.0.6 which require them to immediately enter the supported system Conditions and Required Actions. In other words, once the snubber LCO is removed from the TS, there is no exception from the TS requirements for snubbers and if a snubber is removed for testing (i.e., a snubber is declared inoperable for removal for testing), the supported system Condition and Required Actions must be entered immediately. The only exception is if the supported system has been analyzed and determined to be OPERABLE without the snubber.

At the meeting, it was stated that if a licensee has implemented the ITS and relocated the Snubber specification from the TS, the 72 hour snubber Required Action and Completion Time in the TRM could not be utilized prior to entering the supported system TS Condition and Required Actions when testing snubbers.

At the June 13-14, 2000, TSTF/NRC meeting, Dr. Bill Beckner, Chief of the NRC Technical Specifications Branch, indicated that there was sufficient precedent to support a position that the 72 hour Completion Time can be considered a delay time. The NRC Technical Specification branch has stated that not having the 72 hour window to perform testing is an unintended burden that resulted from implementing the ITS. An example of this precedence is in the NRC memorandum dated May 27, 1986, "Technical Specification Interpretation on Snubbers," which specifically stated the following.

"It should be recognized that the snubber TS are unique in that the operability requirements do not require consideration of associated system redundancy or impact until a snubber is out of service in excess of 72 hours."

At that meeting, the NRC indicated that their preference for a resolution to the issue was some type of change to the TS Section 3.0 requirements.

The intent of this amendment request is to preserve this precedent and extend it to the other non-TS support systems or components (thermal overload devices, penetration conductor overcurrent protection, etc.) for which similar allowances have been assumed to apply, but are now in question.

Proposed Change

The proposed change will add a new LCO to the Section 3.0, LCO and SR Applicability, section of the ISTS. New LCO 3.0.8, states:

When a Technical Specification LCO is not met solely due to a non-Technical Specification support system, listed below, being unable to perform its related support function, the Technical Specification LCO is considered to be met unless the associated delay time of the non-Technical Specification support system has expired. This is an exception to LCO 3.0.2 for the Technical Specification supported system. Upon expiration of the non-Technical Specification support system delay time, the Technical Specification supported system shall be declared inoperable and the applicable Conditions and Required Actions for the Technical Specification supported system shall be entered in accordance with LCO 3.0.2.

<u>Non-Technical Specification Support System</u>	<u>Delay Time</u>
Snubbers	72 hours
Containment Structural Integrity	24 hours
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2 Only)	72 hours
Area Temperature Monitoring (Unit 2 Only)	4 hours

Proposed TS Bases for the proposed LCO 3.0.8 states:

LCO 3.0.8 establishes an exception to LCO 3.0.2 for support systems that do not have an LCO specified in the Technical Specification (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 inability of the non-TS support system to perform its required safety function(s). This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system requirements which are located outside of the TS under licensee control. These requirements are located outside of the TS because they have been determined to not meet the criteria for retention in the TS located in 10 CFR 50.36(c)(2)(ii), and, as such have been determined to be appropriate for control by the licensee.

When one of the non-TS support systems listed in LCO 3.0.8 is not capable of providing the required safety function(s) required for OPERABILITY of a supported TS system, a delay time is provided to allow required maintenance, testing, and/or repair. Licensee-controlled documents may also require other compensatory actions to be taken during the delay time. During this delay time, the supported TS system is not considered inoperable and the Conditions and Required Actions of the supported system do not have to be entered. If the delay time for the non-TS system expires without the support system being restored to a condition in which it can perform the required safety function(s) required for supported system OPERABILITY, the TS supported system must be declared inoperable and its Conditions and Required Actions followed in accordance with LCO 3.0.2.

In addition, adoption of new LCO 3.0.8 eliminates the need for LCO 3.6.1 Condition, A which will make the Farley TS consistent with the ISTS. Associated Bases changes are made as required.

Finally, editorial changes are proposed to address inconsistencies in the format of the TS Bases.

Justification

Prior to conversion to the ITS, the support systems listed in the proposed LCO 3.0.8 were located in the TS. If one of those systems was inoperable, its Actions were taken. Under the pre-ITS conventions and rules, the supported system was not considered inoperable while the support system Actions were being taken. Only when the support system Action Times were expired (or if directed by the support system Actions) was the supported system considered inoperable and its Actions taken.

The systems listed in the proposed LCO 3.0.8 did not meet the criteria for retention in the TS after ITS conversion and were relocated to the TRM or other licensee controlled documents. This

relocation did not alter the requirements on those systems, but allowed those requirements to be changed under the auspices of 10 CFR 50.59. An unintended consequence of that relocation is to require, under the NRC stated interpretation of ITS LCO 3.0.2, the supported systems remaining in TS to be immediately declared inoperable and their Conditions and Required Actions taken when one of the relocated TS systems is not capable of performing its required safety function(s).

This change in operation is not justified by any decrease in plant safety related to the relocation of the requirements but is strictly a consequence of the relocation. The plant design has not changed. The operational actions taken when one of the listed systems does not meet its requirements did not change as a consequence of the relocation. The support systems described in the TRM or other licensee controlled documents continue to perform the function assumed in the safety analysis and the same actions continue to be taken if those support systems cannot perform that function. However, under the ITS, the supported system must be declared inoperable and its Conditions and Required Actions followed, even to the point of a plant shutdown, even though there has been no change in the design or operation of the plant. This decreases plant safety and operational flexibility. The intent of this amendment request is to preserve this precedent for snubbers and extends it to the other non-TS support systems or components (containment structural integrity, penetration conductor overcurrent protection, etc.) for which similar allowances have been assumed to apply, but are now in question.

New LCO 3.0.8 is added consistent with TSTF-372. The allowed delay times for the support systems before restoration of the non-TS systems is acceptable based on the low likelihood of an event occurring during that time requiring the associated functions or challenge the associated supported system. These delay times are consistent with the LCO action times that existed for these support systems when they were included in the TS. In addition, this change is acceptable based on the fact that the support systems provide a backup function and do not provide essential primary protection from analyzed accidents. The proposed LCO 3.0.8 allows sufficient time to correct a problem and therefore reduces the potential risk incurred during a plant transient (shutdown) due to a non-TS support system being found outside of its limits resulting in the immediate application of the required Actions of the supported system.

Effect on Safety Analysis

The plant safety analyses assume that the required safety systems are OPERABLE, except for a single failure. The accident analyses do not consider the effect of an accident occurring while relying on Conditions and Required Actions. The purpose of TS Completion Times is to minimize the length of time that equipment can be out of service should an accident occur. The inoperability of TS supported systems will be limited by the delay time associated with non-TS support systems and the Conditions and Required Actions of the supported system. Therefore, the basic assumptions of the safety analyses are maintained, consistent with the original FNP licensing basis.

Summary

During the conversion to the ITS, the relocation of various TS requirements to the TRM or other licensee controlled documents resulted in an unintended burden related to TS systems having non-TS related supporting systems. The proposed LCO 3.0.8 corrects this unintended consequence and restores the availability of delay times as associated with support systems in effect prior to conversion. The deletion of LCO 3.6.1, Condition A, makes the Farley TS consistent with the ISTS. In addition, editorial changes are made to address inconsistencies in heading formats.

Enclosure 2

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

10 CFR 50.92 Evaluation

Enclosure 2

Joseph M. Farley Nuclear Plant Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems Technical Specification Changes

10 CFR 50.92 Evaluation

A change is proposed to the Technical Specifications (TS) to allow a delay time prior to entering a supported system TS Action when certain support systems not governed by the TS cannot perform their required support function(s). In addition, LCO 3.6.1, Condition A, is deleted restoring consistency to the Improved Standard Technical Specifications (ISTS). Finally, editorial changes are proposed to address inconsistencies in format.

Pursuant to 10 CFR 50.92, SNC has evaluated the proposed amendment and has determined that operation of the facility in accordance with the proposed amendment would not involve a significant hazards consideration. The basis for this determination is as follows:

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

The proposed change deletes Condition A from LCO 3.6.1, makes editorial changes, and allows a delay time before declaring supported TS systems inoperable when certain non-TS support systems cannot perform their required safety function(s). Entrance into Actions is not an initiator of any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on the delay time allowed before declaring a TS supported system inoperable and taking its Required Actions are no different than the consequences of an accident under the same plant conditions while relying on the existing TS supported system Conditions and Required Actions. Therefore, the consequences of an accident previously evaluated are not significantly increased by this change. Thus, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change deletes Condition A from LCO 3.6.1, makes editorial changes, and allows a delay time before declaring supported TS systems inoperable when certain non-TS supporting systems cannot perform their required safety function(s). The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change deletes Condition A from LCO 3.6.1, makes editorial changes, and allows a delay time before declaring supported TS systems inoperable when certain non-TS supporting systems cannot perform their required safety function(s). The proposed change restores an

allowance in the pre-ITS conversion TS, which was unintentionally eliminated by the conversion. The pre-ITS TS were considered to provide an adequate margin of safety for plant operation, as do the post-ITS conversion TS. The plant safety analyses assume that the required safety systems are OPERABLE, except for a single failure. The accident analyses do not consider the effect of an accident occurring while relying on Conditions and Required Actions. The purpose of TS Completion Times is to minimize the length of time that equipment can be out of service should an accident occur. This change ensures that an acceptable limit is placed on the delay time associated with the non-TS support systems and restores the allowance of such a delay time consistent with the pre-conversion TS. Therefore, the margin of safety is not significantly reduced by the proposed change. Therefore, this change does not involve a significant reduction in a margin of safety.

Conclusion

Based on the preceding analysis, SNC has determined that the proposed change to the TS will not significantly increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a significant reduction in a margin of safety. SNC therefore concludes that the proposed change meets the requirements of 10 CFR 50.92(c) and does not involve a significant hazards consideration.

Enclosure 3

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

Marked-Up Technical Specification Pages

Affected Pages

3.0-1

3.0-2

3.0-3

3.6.1-1

3.6.1-2

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 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~~.

3.0.5, LCO 3.0.6,
and LCO 3.0.8.

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

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

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

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

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

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. Exceptions to this Specification are stated in the individual specifications.

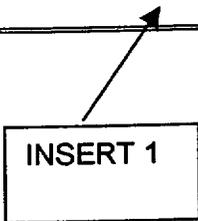
3.0 LCO APPLICABILITY

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 5.5.15, "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.

LCO 3.0.7 Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.



INSERT 1

LCO 3.0.8 When a Technical Specification LCO is not met solely due to a non-Technical Specification support system, listed below, being unable to perform its related support function, the Technical Specification LCO is considered to be met unless the associated delay time of the non-Technical Specification support system has expired. This is an exception to LCO 3.0.2 for the Technical Specification supported system. Upon expiration of the non-Technical Specification support system delay time, the Technical Specification supported system shall be declared inoperable and the applicable Conditions and Required Actions for the Technical Specification supported system shall be entered in accordance with LCO 3.0.2.

<u>Non-Technical Specification Support System</u>	<u>Delay Time</u>
Snubbers	72 hours
Containment Structural Integrity	24 hours
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2 Only)	72 hours
Area Temperature Monitoring (Unit 2 Only)	4 hours

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 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.

3.6 CONTAINMENT SYSTEMS

3.6.1 Containment

LCO 3.6.1 Containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Structural integrity of the containment not conforming to the requirements of SR 3.6.1.2.	A.1 Restore the structural integrity to within limits. A.1	24 hours
B. Containment inoperable for reasons other than Condition A.	B.1 Restore containment to OPERABLE status.	1 hour
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. AND C.2 Be in MODE 5.	6 hours 36 hours

Diagram annotations: Box A points to the first row. Box B points to the second row. Box B.1 points to the 'AND' text between the third and fourth rows. Box B.2 points to the 'AND' text between the third and fourth rows.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.1	Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program.
SR 3.6.1.2	Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.	In accordance with the Containment Tendon Surveillance Program

NOTE: Move Surveillance Requirements to page 3.6.1-1 and delete this page.

Enclosure 4

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

Clean Typed Technical Specification Pages

Affected Pages

3.0-1
3.0-2
3.0-3
3.0-4
3.6.1-1

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 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, LCO 3.0.6, and LCO 3.0.8.

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

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

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

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

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

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. Exceptions to this Specification are stated in the individual specifications.

3.0 LCO APPLICABILITY

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 5.5.15, "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.

LCO 3.0.7 Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

LCO 3.0.8 When a Technical Specification LCO is not met solely due to a non-Technical Specification support system, listed below, being unable to perform its related support function, the Technical Specification LCO is considered to be met unless the associated delay time of the non-Technical Specification support system has expired. This is an exception to LCO 3.0.2 for the Technical Specification supported system.

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.8
(continued)

Upon expiration of the non-Technical Specification support system delay time, the Technical Specification supported system shall be declared inoperable and the applicable Conditions and Required Actions for the Technical Specification supported system shall be entered in accordance with LCO 3.0.2.

<u>Non-Technical Specification Support System</u>	<u>Delay Time</u>
Snubbers	72 hours
Containment Structural Integrity	24 hours
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2 Only)	72 hours
Area Temperature Monitoring (Unit 2 Only)	4 hours

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 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.

3.6 CONTAINMENT SYSTEMS

3.6.1 Containment

LCO 3.6.1 Containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Containment inoperable.	A.1 Restore containment to OPERABLE status.	1 hour
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.1	Perform required visual examinations and leakage rate testing except for containment air lock testing, in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program.
SR 3.6.1.2	Verify containment structural integrity in accordance with the Containment Tendon Surveillance Program.	In accordance with the Containment Tendon Surveillance Program

Enclosure 5

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

Marked-Up Technical Specification Bases Pages

Affected Pages

**B 3.0-1
B 3.0-10
B 3.6.1-3
B 3.6.1-4
B 3.6.1-5**

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.8

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).

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

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

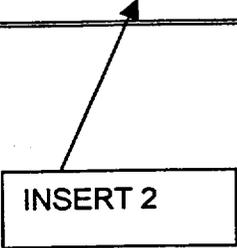
There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type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

(continued)

BASES

LCO 3.0.7
(continued)

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



INSERT 2

INSERT 2

LCO 3.0.8 LCO 3.0.8 establishes an exception to LCO 3.0.2 for support systems that do not 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 inability of the non-TS support system to perform its required safety function(s). This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system requirements, which are located outside of the TS under licensee control. These requirements are located outside of the TS because they have been determined to not meet the criteria for retention in the TS located in 10 CFR 50.36(c)(2)(ii), and, as such, have been determined to be appropriate for control by the licensee.

When one of the non-TS support systems listed in LCO 3.0.8 is not capable of providing the required safety function(s) required for OPERABILITY of a supported TS system a delay time is provided to allow required maintenance, testing, and/or repair. Licensee-controlled documents may also require other compensatory actions to be taken during the delay time. During this delay time, the supported TS system is not considered inoperable and the Conditions and Required Actions of the supported system do not have to be entered. If the delay time for the non-TS system expires without the support system being restored to a condition in which it can perform the required safety function(s) required for supported system OPERABILITY, the TS supported system must be declared inoperable and its Conditions and Required Actions followed in accordance with LCO 3.0.2.

BASES

LCO

Containment OPERABILITY is maintained by limiting leakage to $\leq 1.0 L_a$, except prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test. At this time, the applicable leakage limits must be met.

Compliance with this LCO will ensure a containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis.

Individual leakage rates specified for the containment air lock (LCO 3.6.2) and purge valves with resilient seals (LCO 3.6.3) are not specifically part of the acceptance criteria of 10 CFR 50, Appendix J, Option B. Therefore, leakage rates exceeding these individual limits only result in the containment being inoperable when the leakage results in exceeding the overall acceptance criteria of $1.0 L_a$.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material into containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment is not required to be OPERABLE in MODE 5 to prevent leakage of radioactive material from containment. The requirements for containment during MODE 6 are addressed in LCO 3.9.3, "Containment Penetrations."

ACTIONS

A-4

~~If the requirements of SR 3.6.1.2 are not met, the structural integrity of the containment is in a degraded state. SR 3.6.1.2 ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. If a limit of the Program is not met, Condition A allows 24 hours to restore the structural integrity to within limits. The 24 hour Completion Time allows for the correction of minor problems while providing a limit to the amount of time that the structural integrity of containment may be in a degraded condition during at power conditions.~~

(continued)

BASES

A.1

ACTIONS
(continued)

B.1

In the event containment is inoperable ~~for reasons other than Condition A~~, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining containment during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

C.1 and C.2

B1 and B2

If containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. Failure to meet air lock and purge valve with resilient seal leakage limits specified in LCO 3.6.2 and LCO 3.6.3 does not invalidate the acceptability of these overall leakage determinations unless their contribution to overall Type A, B, and C leakage causes that to exceed limits. As left leakage prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test is required to be $\leq 0.6 L_a$ for combined Type B and C leakage, and $\leq 0.75 L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0 L_a$. At $\leq 1.0 L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

(continued)

BASES

ACTIONS
(continued)

**SURVEILLANCE
REQUIREMENTS**

SR 3.6.1.2

For ungrouted, post tensioned tendons, this SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are consistent with the recommendations of Regulatory Guide 1.35 (Ref. 4).

REFERENCES

1. 10 CFR 50, Appendix J, Option B.
2. FSAR, Chapter 15.
3. FSAR, Section 6.2.
4. Regulatory Guide 1.35, Revision 2.

If a limit of the Containment Tendon Surveillance Program is not met, the structural integrity of the containment is in a degraded state. LCO 3.0.8 allows 24 hours to restore the structural integrity to within limits. The 24-hour Completion Time allows for the correction of minor problems while providing a limit to the amount of time that the structural integrity of containment may be in a degraded condition during at-power conditions. If the 24-hour time limit is exceeded, SR 3.6.1.2 is considered not met, containment is declared inoperable, and the Conditions and Required Actions of LCO 3.6.1 are entered.

Enclosure 6

**Joseph M. Farley Nuclear Plant
Addition of LCO 3.0.8, Inoperability of Non-Technical Specification Support Systems
Technical Specification Changes**

Clean Typed Technical Specification Bases Pages

Affected Pages

B 3.0-1

B 3.0-10

B 3.6.1-3

B 3.6.1-4

B 3.6.1-5

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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

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

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

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

(continued)

BASES

LCO 3.0.7
(continued)

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

LCO 3.0.8

LCO 3.0.8 establishes an exception to LCO 3.0.2 for support systems that do not 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 inability of the non-TS support system to perform its required safety function(s). This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system requirements, which are located outside of the TS under licensee control. These requirements are located outside of the TS because they have been determined to not meet the criteria for retention in the TS located in 10 CFR 50.36(c)(2)(ii), and, as such, have been determined to be appropriate for control by the licensee.

When one of the non-TS support systems listed in LCO 3.0.8 is not capable of providing the required safety function(s) required for OPERABILITY of a supported TS system a delay time is provided to allow required maintenance, testing, and/or repair. Licensee-controlled documents may also require other compensatory actions to be taken during the delay time. During this delay time, the supported TS system is not considered inoperable and the Conditions and Required Actions of the supported system do not have to be entered. If the delay time for the non-TS system expires without the support system being restored to a condition in which it can perform the required safety function(s) required for supported system OPERABILITY, the TS supported system must be declared inoperable and its Conditions and Required Actions followed in accordance with LCO 3.0.2.

BASES

LCO

Containment OPERABILITY is maintained by limiting leakage to $\leq 1.0 L_a$, except prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test. At this time, the applicable leakage limits must be met.

Compliance with this LCO will ensure a containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis.

Individual leakage rates specified for the containment air lock (LCO 3.6.2) and purge valves with resilient seals (LCO 3.6.3) are not specifically part of the acceptance criteria of 10 CFR 50, Appendix J, Option B. Therefore, leakage rates exceeding these individual limits only result in the containment being inoperable when the leakage results in exceeding the overall acceptance criteria of $1.0 L_a$.

APPLICABILITY

In MODES 1, 2, 3, and 4, a DBA could cause a release of radioactive material into containment. In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Therefore, containment is not required to be OPERABLE in MODE 5 to prevent leakage of radioactive material from containment. The requirements for containment during MODE 6 are addressed in LCO 3.9.3, "Containment Penetrations."

ACTIONS

A.1

In the event containment is inoperable, containment must be restored to OPERABLE status within 1 hour. The 1 hour Completion Time provides a period of time to correct the problem commensurate with the importance of maintaining containment during MODES 1, 2, 3, and 4. This time period also ensures that the probability of an accident (requiring containment OPERABILITY) occurring during periods when containment is inoperable is minimal.

(continued)

BASES

ACTIONS
(continued)

B.1 and B.2

If containment cannot be restored to OPERABLE status within the required Completion Time, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

**SURVEILLANCE
REQUIREMENTS**

SR 3.6.1.1

Maintaining the containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Containment Leakage Rate Testing Program. Failure to meet air lock and purge valve with resilient seal leakage limits specified in LCO 3.6.2 and LCO 3.6.3 does not invalidate the acceptability of these overall leakage determinations unless their contribution to overall Type A, B, and C leakage causes that to exceed limits. As left leakage prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test is required to be $\leq 0.6 L_a$ for combined Type B and C leakage, and $\leq 0.75 L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0 L_a$. At $\leq 1.0 L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. SR Frequencies are as required by the Containment Leakage Rate Testing Program. These periodic testing requirements verify that the containment leakage rate does not exceed the leakage rate assumed in the safety analysis.

SR 3.6.1.2

For ungrouted, post tensioned tendons, this SR ensures that the structural integrity of the containment will be maintained in accordance with the provisions of the Containment Tendon Surveillance Program. Testing and Frequency are consistent with the recommendations of Regulatory Guide 1.35 (Ref. 4). If a limit of the Containment Tendon Surveillance Program is not met, the structural integrity of the containment is in a degraded state. LCO 3.0.8 allows

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.6.1.2 (continued)

24 hours to restore the structural integrity to within limits. The 24-hour Completion Time allows for the correction of minor problems while providing a limit to the amount of time that the structural integrity of containment may be in a degraded condition during at-power conditions. If the 24-hour time limit is exceeded, SR 3.6.1.2 is considered not met, containment is declared inoperable, and the Conditions and Required Actions of LCO 3.6.1 are entered.

REFERENCES

1. 10 CFR 50, Appendix J, Option B.
 2. FSAR, Chapter 15.
 3. FSAR, Section 6.2.
 4. Regulatory Guide 1.35, Revision 2.
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