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Revision 54 dated 03/22/02

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## Technical Requirements Manual

Volume I

Detroit  
Edison

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TR 3.0 SURVEILLANCE REQUIREMENT (TRSR) APPLICABILITY

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

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

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

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

Exceptions to this Specification are stated in the individual Specifications.

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TRSR 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 TRLCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

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

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(continued)



BASES

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TRSR 3.0.3

TRSR 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 greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with TRSR 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, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, TRSR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

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

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BASES

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TRSR 3.0.3  
(continued)

assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

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 TRLCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable TRLCO 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 TRSR 3.0.1.

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TRSR 3.0.4

TRSR 3.0.4 establishes the requirements that all applicable TRSRs 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.

The provision 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.

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BASES

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TRSR 3.0.4  
(continued)

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

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

The precise requirements for performance of TRSRs are specified such that exceptions to TRSR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the TRSRs 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 TRLCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the TRLCO 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.

TRSR 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, TRSR 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 TRSR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of 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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