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10CFR50.90

May 14, 2002

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. NPF 50-352 and NPF 50-353

Subject: License Amendment Request 01-01167
Revision to Technical Specifications Regarding a Missed Surveillance Using The
Consolidated Line Item Improvement Process

Reference: Technical Specifications Task Force (TSTF) Traveler-358, "Missed Surveillance
Requirements," Revision 5, as modified by Federal Register Notice 66FR32400,
dated June 14, 2001 and in response to public comments

Pursuant to 10CFR50.90, Exelon Generation Company (EGC), LLC proposes changes to Appendix A, Technical Specifications (TS), of the Limerick Generating Station (LGS) Units 1 & 2 Facility Operating Licenses. The proposed changes would modify TS requirements for a missed surveillance through revision of Specifications 4.0.1 and 4.0.3. In addition, in conjunction with the proposed changes, TS requirements are added for a TS Bases Control Program consistent with the TS Bases Control Program described in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Rev. 2. The proposed changes are consistent with the NRC approved industry Technical Specification Task Force (TSTF) change TSTF-358, Revision 5 (Reference above).

The proposed changes are being submitted as a Consolidated Line Item Improvement Process (CLIP) amendment. The availability of this TS improvement was noticed in the Federal Register 66FR49714, dated September 28, 2001.

Additionally, two administrative changes are proposed. The first deletes the position of "Sr. Manager – Operations" and replaces it using an overall statement referencing the ANSI Standard for "Operations Manager". This is the recommended practice as stated in NUREG-1433 Rev. 2. The second administrative change revises the LGS TS requirement for PORC member composition replacing "Experience Assessment" with "Regulatory Assurance" to reflect Exelon organizational changes.

The proposed changes have been reviewed by the Plant Operations Review Committee and approved by the Nuclear Safety Review Board. This information is being submitted under unsworn declaration.

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Revision to Technical Specifications Regarding a Missed
Surveillance Using The Consolidated Line Item Improvement Process
May 14, 2002
Page 2

We are notifying the State of Pennsylvania of this application for changes to the TS and Operating Licenses by transmitting a copy of this letter and its attachments to the designated state officials.

Exelon requests approval of the proposed amendment by November 14, 2002.

Once approved, this amendment shall be implemented within 60 days of issuance. This proposed amendment request is subdivided as follows.

1. Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability of the model safety evaluation (SE) and no significant hazards consideration (NSHC) determination, and plant-specific verifications.
2. Attachment 2 includes the marked-up TS pages.
3. Attachment 3 provides the camera-ready TS pages.
4. Attachment 4 provides a summary of the licensing commitments made in this submittal.
5. Attachment 5 provides the existing TS Bases pages, marked up to show the proposed changes. The TS Bases changes are provided for information only.

If you have any questions or require additional information, please contact me at (610) 765-5664.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 5-14-02


Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Enclosures: Attachment 1: Description and Assessment
Attachment 2: Marked-Up TS Pages
Attachment 3: Camera-ready TS Pages
Attachment 4: List of Commitments
Attachment 5: Marked-up TS Bases pages (Information only)
Attachment 6: Camera-ready TS Bases pages

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
C. Gratton, Senior Project Manager, USNRC
R. R. Janati, Commonwealth of Pennsylvania

**ATTACHMENT 1
DESCRIPTION AND ASSESSMENT**

**LIMERICK GENERATING STATION
UNITS 1 and 2**

**DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85**

LICENSE AMENDMENT REQUEST 01-01167

**"Revision to Technical Specifications Regarding a Missed Surveillance
Using The Consolidated Line Item Improvement Process"**

ATTACHMENT 1

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, proposes changes to the Limerick Generating Station Units 1 & 2 (LGS) Technical Specifications (TS), Facility Operating License Nos. NPF-39 and NPF-85.

The proposed changes would modify the TS requirements for a missed surveillance through revision of LGS TS 4.0.1 and 4.0.3. In addition, in conjunction with the proposed changes, TS requirements are added for a TS Bases Control Program consistent with the TS Bases Control Program described in NUREG-1433 (Reference 4).

Additionally, two administrative changes are proposed. The first deletes the position of "Sr. Manager – Operations" and replaces it using an overall statement referencing the ANSI Standard for "Operations Manager". This is the recommended practice as stated in NUREG-1433. The second administrative change revises the LGS TS requirement for PORC member composition due to Exelon organizational changes.

2.0 DESCRIPTION

This license amendment request (LAR) revises LGS TS 4.0.1 and 4.0.3 to be consistent with NUREG-1433 (Reference 4) and with the NRC approved industry Technical Specification Task Force (TSTF) traveler TSTF-358, Revision 5 (Reference 1) as modified by Federal Register Notice 66FR32400, dated June 14, 2001 (Reference 2) and in response to public comments. Since LGS is a non-Improved Standard Technical Specification plant, additional changes are required to LGS TS 4.0.1 and 4.0.3 so that TSTF-358 can be utilized via the Consolidated Line Item Improvement Process (CLIIP). The TS Bases for LGS TS 4.0.1 and 4.0.3 have also been revised in accordance with NUREG-1433.

In addition, this LAR adds a TS Bases Control Program to the LGS TS. This program is identical to the TS Bases control program described in NUREG-1433.

The proposed changes are being submitted under the CLIIP as noticed in the Federal Register, 66FR49714, dated September 28, 2001 (Reference 3).

This LAR proposes two administrative changes as well. The first change, to LGS TS 6.2.2.g, deletes the position title of "Sr. Manager – Operations" and replaces it using an overall statement referencing the ANSI Standard for "Operations Manager". This is the recommended practice as stated in NUREG-1433. The second administrative change revises the LGS TS requirement for PORC member composition due to EGC organizational changes. The "Experience Assessment" group has been renamed "Regulatory Assurance", which affects LGS TS 6.5.1.2. Please note that these administrative changes will not be discussed in the "Assessment" section below, but will be discussed in the "No Significant Hazards Consideration" and "Environmental Evaluation".

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DESCRIPTION AND ASSESSMENT

3.0 ASSESSMENT

3.1 Applicability of Published Safety Evaluation

EGC has reviewed the safety evaluation dated June 14, 2001 (Reference 2), as referenced in the notice of availability of this CLIP, dated September 28, 2001 (Reference 3). This review included a review of the NRC staff evaluation, as well as the supporting information provided to support TSTF-358. EGC has concluded that the justification presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to LGS, and hereby incorporates by reference the safety evaluation presented in the CLIP and TSTF-358, Rev. 5 into this submittal. Since LGS does not currently have a TS Bases Control Program, EGC also incorporates by reference the Optional Section of the safety evaluation applicable to licensees adopting a Bases Control Program.

It should be noted that while the published Safety Evaluation refers to Surveillance Requirements (SR) 3.0.1 and 3.0.3 and the LGS TS contain related Specifications 4.0.1 and 4.0.3, the justification is still applicable to the LGS TS as modified by this license amendment request.

3.2 Optional Changes and Variations

There are some plant-specific changes proposed that vary from the subject CLIP item, whose availability was noticed in the Federal Register, 66FR49714, dated September 28, 2001 (Reference 3).

LGS Technical Specifications (TS) 4.0.1 and 4.0.3 have been re-written to match SRs 3.0.1 and 3.0.3, respectively, from NUREG-1433 (Reference 4).

LGS TS 4.0.1

NUREG-1433 SR 3.0.1 is constructed to more completely represent the relationship between Surveillance Requirements and meeting the requirements of the LCO. Using NUREG-1433 SR 3.0.1 as the basis, the concepts within the existing LGS TS 4.0.3 are combined with the existing LGS TS 4.0.1, into the proposed LGS TS 4.0.1.

LGS TS 4.0.3

Both LGS TS 4.0.3 and NUREG-1433 SR 3.0.3 allow that, at the time it is discovered that the Surveillance has not been performed, the requirement to declare the equipment inoperable (LCO not met) may be delayed for up to 24 hours. This is based on NRC Generic Letter 87-09, which states, "It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed. The opposite is in fact the case, the vast majority of surveillances demonstrate that systems or components in fact are operable. When a Surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance."

Based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the Surveillance and the safety significance of the delay in completing the Surveillance, the NRC concluded in Generic Letter 87-09 that 24 hours is an acceptable time limit for completing a missed Surveillance when the allowable outage

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DESCRIPTION AND ASSESSMENT

times of the ACTIONS are less than the 24 hour limit or a shutdown is required to comply with ACTIONS.

However, following the argument that led to the development of NUREG-1433 SR 3.0.3, it stands to reason that since 24 hours has been determined to be an acceptable time limit for completing the Surveillance, this 24 hour deferral should apply to all systems or components, regardless of whether or not their ACTIONS completion time is 24 hours or less. This is primarily because shorter completion times are generally provided for more safety significant ACTIONS. Therefore, if a 24 hour delay can be safely applied to an ACTION with a short (e.g., 2 hour) completion time, there should be less of a safety impact when a 24 hour delay is applied to an ACTION with a long (e.g., 7 day) completion time. Furthermore, consistent application of the 24 hour delay regardless of completion time is critical to eliminating potential confusion and misapplication. Therefore, SR 3.0.3 (Reference 4), and the proposed LGS TS 4.0.3 based on it, have eliminated the restriction that the extension only applies to outage times less than 24 hours.

The second and third paragraphs of LGS TS 4.0.3 are added to clearly state the actions to take if the Surveillance is not performed within the delay period or the Surveillance fails when performed. This clarification helps avoid confusion as to when to enter the ACTIONS in various situations.

The associated LGS TS Bases sections, 4.0.1 and 4.0.3, are revised per NUREG-1433 and the subject CLIIP. They are included, for information only, as Attachment 5 to this license amendment request.

4.0 REGULATORY ANALYSIS

4.1 No Significant Hazards Determination

CHANGES TO LGS TS 4.0.1 & 4.0.3 AND ADDITION OF TS BASES CONTROL PROGRAM

EGC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. EGC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to LGS and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

CHANGES TO LGS TS SECTION 6

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC is requesting changes to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. NPF-39 and NPF-85, for Limerick Generating Station (LGS), Units 1 and 2.

The proposed changes will address the following issues:

TS Section 6.2.2, "Unit Staff," Specification 6.2.2.g. is being revised to replace the position title of Sr. Manager – Operations by use of an overall statement referencing the ANSI Standard for "Operations Manager". This is the recommended practice as stated in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001.

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TS 6.5.1.2 "Composition" is being revised to replace "Experience Assessment" with "Regulatory Assurance" as the required area of experience for the collective Plant Onsite Review Committee (PORC) membership.

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

The proposed TS and licensing basis changes are administrative changes to eliminate obsolete position and work group titles and incorporate the equivalent titles in use by EGC at other fleet nuclear facilities.

These changes do not involve any physical change to structures, systems, or components (SSCs) and does not alter the method of operation or control of SSCs. The current assumptions in the safety analysis regarding accident initiators and mitigation of accidents are unaffected by these administrative changes. No additional failure modes or mechanisms are being introduced and the likelihood of previously analyzed failures remains unchanged.

The integrity of fission product barriers, plant configuration, and operating procedures will not be affected by these changes. Therefore, the consequences of previously analyzed accidents will not increase because of these changes.

Based on the above discussion, the proposed TS changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed TS and licensing basis changes are administrative changes to eliminate obsolete position and work group titles and incorporate the equivalent titles in use by EGC at other fleet nuclear facilities.

The current accident analysis will remain valid following these administrative changes to TS. The changes will not alter the administrative functions that are currently in use. The qualification requirements for the individuals performing the affected TS administrative functions will remain unchanged.

The proposed TS changes do not affect plant design, hardware, system operation, or procedures; therefore, based on the above discussion, the proposed TS changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed TS and licensing basis changes are administrative changes to revise current position titles to reflect equivalent position titles in use by EGC at other fleet nuclear facilities.

The revision of the collective experience of the PORC membership to include Regulatory Assurance experience is equivalent to the current requirement for Experience Assessment

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experience. The functions of the Regulatory Assurance group remain essentially unchanged due to merger initiatives. The Regulatory Assurance group is the site process owner for the Corrective Action Process (CAP), the Self Assessment Process, the PORC Process, the Commitment Tracking Process, the Operating Experience Process, support of NRC inspections and issue closure. Therefore, there is no reduction in PORC member qualification requirements due to this change.

The requirement for the "Operations Manager" to hold a Senior Reactor Operator license is equivalent to the requirement for the Sr. Manager - Operations or an Operations Manager to hold a Senior Reactor Operator license.

Based on the above discussion, the proposed TS changes do not involve a significant reduction in a margin of safety.

Conclusion

Based upon the evaluation above, we have concluded that the three criteria of 10 CFR 50.92(c) are satisfied and that the proposed changes to the TS involve no significant hazards consideration.

4.2 Verification and Commitments for Changes to LGS TS 4.0.1 & 4.0.3

As discussed in the notice of availability published in the Federal Register on September 28, 2001 for this TS improvement, plant-specific verifications were performed.

EGC has established TS Bases for LGS TS 4.0.3 which state that use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

The LAR also includes changes to the Bases for LGS TS 4.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that EGC is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the 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 Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases will state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases will also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases will state that all missed surveillances will be placed in the station's Corrective Action Program.

Finally, this LAR proposes a TS change that incorporates a TS Bases Control Program consistent with Section 5.5 of NUREG-1433, Rev. 2.

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5.0 ENVIRONMENTAL EVALUATION

CHANGES TO LGS TS 4.0.1 & 4.0.3

EGC has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001, as part of the CLIP (Reference 2). EGC has concluded that the staff's findings presented in that evaluation are applicable to LGS and the environmental evaluation is hereby incorporated by reference for this application.

CHANGES TO LGS TS SECTION 6

An environmental assessment is not required for the proposed changes since the proposed changes conform to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22(c)(9). The proposed changes will have no impact on the environment. The proposed changes do not involve a significant hazards consideration as discussed in the preceding section. The proposed changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, the proposed changes do not involve a significant increase in individual or cumulative occupational radiation exposure.

6.0 REFERENCES

- 1 Industry/Technical Specifications Task Force Standard Technical Specification Change Traveler-358, "Missed Surveillance Requirements," Revision 5, as modified by Federal Register Notice 66FR32400, dated June 14, 2001 and in response to public comments
- 2 Federal Register, Volume 66, Number 115, Pages 32400-32407, "Notice of Opportunity To Comment on Model Safety Evaluation on Technical Specification Improvement To Modify Requirements Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process," dated June 14, 2001
- 3 Federal Register, Volume 66, Number 189, Pages 49714-49717, "Notice of Availability of Model Application Concerning Technical Specification Improvement To Modify Requirements Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process," dated September 28, 2001
4. NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001.

**ATTACHMENT 2
MARKED-UP TECHNICAL SPECIFICATIONS PAGES**

**LIMERICK GENERATING STATION
UNITS 1 and 2**

**DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85**

LICENSE AMENDMENT REQUEST 01-01167

**"Revision to Technical Specifications Regarding a Missed Surveillance
Using The Consolidated Line Item Improvement Process"**

REVISED TS PAGES

UNIT 1

3/4 0-2

6-3

6-7

6-14c

UNIT 2

3/4 0-2

6-3

6-7

6-14c

Inserts for LGS License Amendment Request to Modify Technical Specification Requirements Regarding Missed Surveillances Using the CLIP

Insert 1:

Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

Insert 2:

If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, 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 Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

Insert 3:

h. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.

Insert 3 continued

- d. Proposed changes that meet the criteria of b. above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

APPLICABILITY

SURVEILLANCE REQUIREMENTS

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

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

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified 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.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition 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 CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a.
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ADMINISTRATIVE CONTROLS
PROCEDURES AND PROGRAMS (Continued)

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss coolant accident, P_c , is 44.0 psig.

The maximum allowable primary containment leakage rate, L_c , at P_c , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to $1.0 L_c$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to $0.60 L_c$ for the Type B and Type C tests and less than or equal to $0.75 L_c$ for Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall airlock leakage rate is less than or equal to $0.05 L_c$ when tested at greater than or equal to P_c .
 - 2) Seal leakage rate is less than or equal to 5 scf per hour when the gap between the door seals is pressurized to 10 psig.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

INSERT 3

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ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. ~~The Sr. Manager - Operations or an Operations Manager shall hold a Senior Reactor Operator License.~~ |

The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 section 4.2.2 or another Manager in Operations shall hold a Senior Reactor Operator License.

REPLACE

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ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- ~~Experience Assessment~~

REPLACE

REGULATORY ASSURANCE

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

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APPLICABILITY

SURVEILLANCE REQUIREMENTS

INSERT 1
4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

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

INSERT 2
4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified 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.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition 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 CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a.
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_c , is 44.0 psig.

The maximum allowable primary containment leakage rate, L_c , at P_c , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to $1.0 L_c$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to $0.60 L_c$ for the Type B and Type C tests and less than or equal to $0.75 L_c$ for Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall airlock leakage rate is less than or equal to $0.05 L_c$ when tested at greater than or equal to P_c .
 - 2) Seal leakage rate is less than or equal to 5 scf per hour when the gap between the door seals is pressurized to 10 psig.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

INSERT 3

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. ~~The Sr. Manager - Operations or an Operations Manager shall hold a Senior Reactor Operator License.~~

The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 section 4.2.2 or another Manager in Operations shall hold a Senior Reactor Operator License.

REPLACE

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

Plant Operations
Engineering
Maintenance
Instrumentation and Controls
Planning
Radiation Safety
Chemistry
~~Experience Assessment~~

REPLACE

REGULATORY ASSURANCE

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

**ATTACHMENT 3
CAMERA-READY TECHNICAL SPECIFICATIONS PAGES**

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85

LICENSE AMENDMENT REQUEST 01-01167

“Revision to Technical Specifications Regarding a Missed Surveillance
Using The Consolidated Line Item Improvement Process”

REVISED TS PAGES

UNIT 1
3/4 0-2
6-3
6-7
6-14c

UNIT 2
3/4 0-2
6-3
6-7
6-14c

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, 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 Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition 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 CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a.
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 section 4.2.2 or another Manager in Operations shall hold a Senior Reactor Operator License.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Operations Review Committee is composed of nine regular members from the Limerick Generating Station staff. Members shall collectively have experience in the following areas:

- Plant Operations
- Engineering
- Maintenance
- Instrumentation and Controls
- Planning
- Radiation Safety
- Chemistry
- Regulatory Assurance

Members shall meet the requirements of ANSI/ANS 3.1-1978, Section 4.7, for the applicable required experience and be appointed in writing by the Plant Manager. The Chairman and alternate Chairmen of the PORC shall be drawn from the PORC members and appointed in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ADMINISTRATIVE CONTROLS
PROCEDURES AND PROGRAMS (Continued)

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 44.0 psig.

The maximum allowable primary containment leakage rate, L_a , at P_a , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to $1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to $0.60 L_a$ for the Type B and Type C tests and less than or equal to $0.75 L_a$ for Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall airlock leakage rate is less than or equal to $0.05 L_a$ when tested at greater than or equal to P_a .
 - 2) Seal leakage rate is less than or equal to 5 scf per hour when the gap between the door seals is pressurized to 10 psig.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

h. Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of b. above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF (Continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or personnel designated in administrative procedures or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager, or the appropriate designated personnel to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized; and

- g. The individual filling the position of Operations Manager as defined by ANSI/ANS-3.1-1978 section 4.2.2 or another Manager in Operations shall hold a Senior Reactor Operator License.

ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 Training programs for the unit staff shall be maintained under the direction of the site training organization. The retraining and replacement training programs for all affected positions except licensed operators shall meet or exceed the standards of ANSI/ANS 3.1-1978. The retraining and replacement training programs for licensed operators shall comply with the requirements of 10 CFR 55, and shall include familiarization with relevant industry operational experience.

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6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

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ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

g. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54 (o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163 "Performance-Based Containment Leakage Test program," dated September 1995.

The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 44.0 psig.

The maximum allowable primary containment leakage rate, L_a , at P_a , shall be 0.5% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary Containment leakage rate acceptance criterion is less than or equal to $1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are less than or equal to $0.60 L_a$ for the Type B and Type C tests and less than or equal to $0.75 L_a$ for Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall airlock leakage rate is less than or equal to $0.05 L_a$ when tested at greater than or equal to P_a .
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The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the tests described in the Primary Containment Leakage Rate Testing Program.

h. Technical Specifications (TS) Bases Control Program

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- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

A change in the TS incorporated in the license; or

A change to the UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of b. above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

ATTACHMENT 4

LIST OF COMMITMENTS

The following table identifies those actions committed to by Exelon Generation Company (EGC), LLC, in this document. Any other statements in this submittal are provided for information purposes and are not considered to be commitments.

COMMITMENT	Due Date/Event
EGC will establish the Technical Specification Bases for Specifications 4.0.1 and 4.0.3 as adopted with the applicable license amendment.	Implemented with the implementation of the License amendment
EGC will establish a TS Bases Control Program consistent with the requirements of NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2, dated June 2001.	Implemented with the implementation of the License amendment

**ATTACHMENT 5
MARKED-UP TECHNICAL SPECIFICATIONS BASES PAGES**

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85

LICENSE AMENDMENT REQUEST 01-01167

“Revision to Technical Specifications Regarding a Missed Surveillance
Using The Consolidated Line Item Improvement Process”

REVISED TS BASES PAGES

UNIT 1

B 3/4 0-3
B 3/4 0-4
B 3/4 0-5

UNIT 2

B 3/4 0-3
B 3/4 0-4
B 3/4 0-5

**Inserts for LGS License Amendment Request to Modify
Technical Specification Bases Requirements Regarding Missed Surveillances Using the
CLIP**

Insert 4:

Specification 4.0.1 establishes the requirement that SRs must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation 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 Surveillance time interval and allowed extension, in accordance with Specification 4.0.2, constitutes a failure to meet the Limiting Condition for Operation.

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 unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception Limiting Conditions for Operation are only applicable when the Special Test Exception Limiting Condition for Operation 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 OPERATIONAL CONDITION or other specified condition.

Surveillances, including Surveillances invoked by ACTION requirements, 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 Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL CONDITION or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL CONDITION or other specified condition where other necessary post maintenance tests can be completed.

Insert 4 continued

Some examples of this process are:

- a. Control Rod Drive maintenance during refueling that requires scram testing at > 950 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of Specification 4.1.3.2 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 950 psi 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.

Insert 5:

Specification 4.0.3 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 Surveillance time interval and allowed extension. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval and allowed extension 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 ACTION requirements 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 Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10CFR50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION changes imposed by ACTION Requirements.

Failure to comply with specified Surveillance time intervals and allowed extensions for SRs is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 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 Surveillance time interval 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 assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk

Insert 5 continued

impact should be managed through the program in place to implement 10CFR50.65 (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 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 ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period or the variable is outside the specified limits, then the equipment is inoperable 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 allowed times specified in the ACTION requirements, restores compliance with Specification 4.0.1.

BASES

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL CONDITIONS or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the

INSERT 4

3/4.0 APPLICABILITY

BASES

operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in an OPERATIONAL CONDITION or other specified condition for which the individual Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL CONDITION for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

INSERT 4,
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Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation and any reports required by 10 CFR 50.73 shall be determined based on the length of time the surveillance interval has been exceeded, and the corresponding Limiting Conditions for Operation ACTION time requirements.

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Amendment No. 11, 38, 71

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If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown would be required to comply with ACTION requirements or before other remedial measures would be required that may preclude the completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of CONDITION changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.

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The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL CONDITIONS or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the

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operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in an OPERATIONAL CONDITION or other specified condition for which the individual Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL CONDITION for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

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Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation and any reports required by 10 CFR 50.73 shall be determined based on the length of time the surveillance interval has been exceeded, and the corresponding Limiting Conditions for Operation ACTION time requirements.

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If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown would be required to comply with ACTION requirements or before other remedial measures would be required that may preclude the completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of CONDITION changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.

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**ATTACHMENT 6
CAMERA-READY TECHNICAL SPECIFICATIONS BASES PAGES**

**LIMERICK GENERATING STATION
UNITS 1 and 2**

**DOCKET NOS. 50-352
50-353
LICENSE NOS. NPF-39
NPF-85**

LICENSE AMENDMENT REQUEST 01-01167

**“Revision to Technical Specifications Regarding a Missed Surveillance
Using The Consolidated Line Item Improvement Process”**

CAMERA-READY TS BASES PAGES

**UNIT 1
B 3/4 0-3
B 3/4 0-3a
B 3/4 0-4
B 3/4 0-5**

**UNIT 2
B 3/4 0-3
B 3/4 0-3a
B 3/4 0-4
B 3/4 0-5**

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The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that SRs must be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for which the requirements of the Limiting Condition for Operation 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 Surveillance time interval, in accordance with Specification 4.0.2, constitutes a failure to meet the Limiting Condition for Operation.

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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 unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception Limiting Conditions for Operation are only applicable when the Special Test Exception Limiting Condition for Operation 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 OPERATIONAL CONDITION or other specified condition.

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 Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL CONDITION or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL CONDITION 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 > 950 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 4.1.3.2 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 950 psi 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.

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Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 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 Surveillance time interval. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval 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 Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10CFR50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION 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 Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

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While up to 24 hours or the limit of the specified Surveillance time interval 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 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 10CFR50.65 (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 ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period or the variable is outside the specified limits, then the equipment is inoperable 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 Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.

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The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

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BASES

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
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Surveillances do not have to be performed when the unit is in an OPERATIONAL CONDITION or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception Limiting Conditions for Operation are only applicable when the Special Test Exception Limiting Condition for Operation 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 OPERATIONAL CONDITION or other specified condition.

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 Specification 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current OPERATIONAL CONDITION or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to an OPERATIONAL CONDITION 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 > 950 psi. However, if other appropriate testing is satisfactorily completed and the scram time testing of SR 4.1.3.2 is satisfied, the control rod can be considered OPERABLE. This allows startup to proceed to reach 950 psi 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.

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Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 24-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that REFUELING INTERVAL surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 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 Surveillance time interval. A delay period of up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified Surveillance time interval 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 Surveillance time interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering OPERATIONAL CONDITION 1 after each fuel loading, or in accordance with 10CFR50, Appendix J, as modified by approved exemptions, etc.) is discovered to have not been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified Surveillance time interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of OPERATIONAL CONDITION 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 Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

APPLICABILITY

BASES

While up to 24 hours or the limit of the specified Surveillance time interval 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 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 10CFR50.65 (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 ACTION requirements for the applicable Limiting Condition for Operation begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period or the variable is outside the specified limits, then the equipment is inoperable 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 Specification 4.0.1.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Additionally, the Inservice Inspection Program conforms to the NRC staff positions identified in NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," as approved in NRC Safety Evaluations dated March 6, 1990 and October 22, 1990.