
Industry/TSTF Standard Technical Specification Change Traveler

Clarifying SR 3.0.1 Bases to state that Surveillance can be performed in steps

NUREGs Affected: 1430 1431 1432 1433 1434

Classification: 4) Change Bases

Recommended for CLIP?: No

Priority: 4)Edit/Bases

Simple or Complex Change: Simple

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1.0 Description

The SR 3.0.1 Bases are revised to state that Surveillances may be performed by means of any series of sequential, overlapping, or total steps..

2.0 Proposed Change

The SR 3.0.1 Bases are revised to state that Surveillances may be performed by means of any series of sequential, overlapping, or total steps. This reflects an accepted Industry practice. However, certain Surveillance related Definitions explicitly state that those Surveillances may be performed by any series of sequential, overlapping, or total steps. This infers that the practice must be explicitly allowed. To avoid confusion, the Bases of SR 3.0.1 are revised to explicitly acknowledge this practice.

3.0 Background

The definitions related to instrument testing, such as CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, and CHANNEL OPERATIONAL TEST, contain a sentence stating that the tests may be performed by means of any series of sequential, overlapping, or total steps. TSTF-205, Rev. 3, which has been approved by the NRC, added this phrase to instrument testing-related definitions from which it had been omitted.

It is an accepted practice that any Surveillance can be performed by means of any series of sequential, overlapping, or total steps as long as the entire Surveillance is performed as specified in the Technical Specifications. However, the inclusion of explicit allowances to perform CHANNEL CALIBRATIONS, CHANNEL FUNCTIONAL TESTS, AND CHANNEL OPERATIONAL TESTS by means of any series of sequential, overlapping, or total steps implies that this allowance is not provided for any other types of Surveillances. Without the proposed general clarification to SR 3.0.1, this practice could be construed to be a violation of some Surveillance Requirements.

02-Jun-02

4.0 Technical Analysis

SR 3.0.1 is established to require that Surveillances be met. The Definitions of the terms "CHANNEL CALIBRATION," "CHANNEL FUNCTIONAL TEST," and "CHANNEL OPERATIONAL TEST" contain the sentence, "The [CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, or CHANNEL OPERATIONAL TEST] may be performed by means of any series of sequential, overlapping, or total channel steps."

It is logical to infer that the inclusion of this statement in those definitions is necessary to allow the corresponding Surveillances to be performed in the manner described. Otherwise, there would be no reason to include the statements in the definitions. It is also logical to infer that the absence of such a qualification means that the allowance to perform other Surveillances in this manner is not available.

However, there is no reason why all Surveillances cannot be performed by means of a series of sequential, overlapping, or total channel steps. Surveillances are routinely performed in overlapping or sequential pieces for reasons such as avoiding the actuation of equipment which should not be run during power operation, improving scheduling and resource management, and reducing plant risk by scheduling when equipment is out of service.

The proposed change to the SR 3.0.1 Bases does not provide any additional flexibility than is routinely assumed to apply currently, but clarifies that the existing practices are acceptable.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

Changes to the ITS Bases do not require a Determination of No Significant Hazards Consideration.

5.2 Applicable Regulatory Requirements/Criteria

This change does not affect any regulatory requirements or criteria.

6.0 Environmental Consideration

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0 References

None

Revision History

OG Revision 0

Revision Status: Closed

02-Jun-02

OG Revision 0**Revision Status: Closed**

Revision Proposed by: Virginia Power

Revision Description:
Original Issue**Owners Group Review Information**

Date Originated by OG: 11-Aug-99

Owners Group Comments:
(No Comments)

Owners Group Resolution: Approved Date: 11-Aug-99

TSTF Review Information

TSTF Received Date: 12-Aug-99 Date Distributed for Review:

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

TSTF recommends reducing scope of change to modifying the Bases of SR 3.0.1.

TSTF Resolution: Superceded Date: 19-Mar-01

OG Revision 1**Revision Status: Active****Next Action: NRC**

Revision Proposed by: Dominion

Revision Description:
Complete Replacement. Limited scope to SR 3.0.1 Bases change. Drafted Safety Evaluation quality justification.**Owners Group Review Information**

Date Originated by OG: 19-Mar-01

Owners Group Comments:
(No Comments)

Owners Group Resolution: Approved Date: 18-Jul-01

TSTF Review Information

TSTF Received Date: 18-Jul-01 Date Distributed for Review: 05-Feb-02

OG Review Completed: BWOG WOG CEOG BWROGTSTF Comments:
(No Comments)

TSTF Resolution: Approved Date: 05-Feb-02

NRC Review Information

NRC Received Date: 03-Jun-02

02-Jun-02

OG Revision 1

Revision Status: Active

Next Action: NRC

Affected Technical Specifications

SR 3.0.1 Bases

SR Applicability

02-Jun-02

INSERT 1

Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

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

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. ← **Insert 1**

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

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

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

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

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

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current

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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 either:

- 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 a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception (STE) LCO are only applicable when the STE LCO is used as an allowable exception to the requirements of a Specification.

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