

Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385



JUL 19 2002

Docket No. 50-423
B18610

RE: 10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 3
License Bases Document Change Request 3-3-02
Missed Surveillances Using Consolidated Line Item
Improvement Process (CLIP)

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License No. NPF-49 by incorporating the proposed changes into the Millstone Unit No. 3 Technical Specifications. The proposed amendment would modify the Technical Specification requirements for missed surveillances in Specification 4.0.3 as well as modify the associated Technical Specification Bases. The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF), Standard Technical Specifications Change TSTF-358, Revision 6. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001, (Federal Register Notice 66FR 49714) as part of the Consolidated Line Item Improvement Process (CLIP).

Attachment 1 provides a description of the proposed changes, the requested confirmation of applicability, and plant-specific verification. Attachment 2 provides the existing Technical Specification pages, including Bases pages, marked up to show the proposed changes. Attachment 3 provides the retyped pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

The proposed amendment request does not involve a significant hazards consideration pursuant to the provisions of 10 CFR 50.92 (Attachment 1). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of this amendment (Attachment 1).

The Site Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

A001

In a letter dated November 8, 2001,⁽¹⁾ DNC submitted a license amendment request to incorporate a Technical Specification Bases control program within the Millstone Unit No. 3 Technical Specifications, with a request for approval by November 7, 2002. We would like to implement the amendment related to the missed surveillance concurrent with or after the implementation of the amendment related to the Bases control program. Therefore, we request issuance of this amendment by November 30, 2002, with the amendment to be implemented within 90 days of issuance.

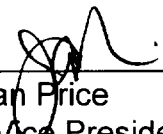
In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

The regulatory commitments contained in this letter are located in Attachment 4.

If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.



J. Alan Price
Site Vice President - Millstone

Subscribed and sworn to before me

this 19 day of July, 2002

Diane M Phillipi

Notary Public

Date Commission Expires: 12/31/2005

**DIANE M. PHILLIPO
NOTARY PUBLIC
MY COMMISSION EXPIRES 12/31/2005**

cc: See next page

⁽¹⁾ J. Alan Price letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3, Technical Specification Change Request, Administrative and Editorial Changes to Unit Nos. 1, 2 and 3 Technical Specifications," dated November 8, 2001.

Attachments (4)

cc: H. J. Miller, Region I Administrator
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
NRC Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Attachment 1

Millstone Nuclear Power Station, Unit No. 3

License Basis Document Change Request 3-3-02
Missed Surveillances

Using Consolidated Line Item Improvement Process (CLIP)
Discussion of the Proposed Changes and Assessment

License Basis Document Change Request 3-3-02
Missed Surveillances
Using Consolidated Line Item Improvement Process (CLIP)
Discussion of the Proposed Changes and Assessment

1. INTRODUCTION

The proposed amendment would revise the Millstone Unit No. 3 Technical Specification 4.0.3 requirements for missed surveillances consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specifications Change TSTF-358, Revision 6. The proposed changes are being submitted in conjunction with the Consolidated Line Item Improvement Process (CLIP).

2. DESCRIPTION OF THE PROPOSED CHANGE

The proposed amendment would revise Technical Specification requirements for missed surveillances in Specifications 4.0.1 and 4.0.3. Dominion Nuclear Connecticut, Inc. (DNC) proposes to make the following three (3) specific changes to accommodate the changes addressed by the CLIP.

- Convert Specifications 4.0.1 and 4.0.3 from current Millstone Unit No. 3 Technical Specifications format to Improved Standard Technical Specification format (i.e., NUREG-1431).
- Incorporate the changes proposed by TSTF-358, Revision 6 (CLIP).
- Incorporate a Bases Control Program into Section 6.0, Administrative Controls.
 - In a letter dated November 8, 2001,⁽¹⁾ DNC submitted a license amendment request to incorporate a Technical Specification Bases Control Program within the Millstone Unit No. 3 Technical Specifications.

3. ASSESSMENT

3.1 Optional Changes and Variations

Current Millstone Unit No. 3 Technical Specifications allow a delay period of up to 24 hours to perform a missed surveillance prior to meeting the associated ACTION requirements. The proposed changes, which are based on industry and NRC approved TSTF-358, Revision 6, would modify this delay period to 24 hours or up to the specified surveillance interval, whichever is greater. A risk

⁽¹⁾ J. Alan Price letter to the U.S. Nuclear Regulatory Commission, "Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3, Technical Specification Change Request, Administrative and Editorial Changes to Unit Nos. 1, 2 and 3 Technical Specifications," dated November 8, 2001.

evaluation would be performed for any missed surveillance delayed greater than 24 hours. A missed surveillance requiring a Mode change or other change in plant conditions would be performed at the first reasonable opportunity. The benefit of this proposed amendment request would be reduction of the need to apply for regulatory relief for a missed surveillance and the associated need to subject the unit to otherwise unnecessary plant transients or shutdowns. The availability of this Technical Specification improvement was published in the Federal Register on September 28, 2001, (Federal Register Notice 66 FR 449714) as part of the CLIP.

Due to the vintage of the Millstone Unit No. 3 Technical Specifications, incorporation of the changes in the CLIP will entail three (3) areas of change. First, DNC proposes to modify the wording of the current Specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2. These changes are necessary in order to make the current Technical Specifications compatible with the proposed changes of TSTF-358. Second, Specification 4.0.3 and associated Bases will be modified in accordance with the CLIP. Finally, since DNC has not fully implemented the Improved Standard Technical Specifications, DNC proposes to incorporate a Bases Control Program in Section 6.0 of the Technical Specifications as follows. In a letter dated November 8, 2001, DNC submitted a license amendment request to incorporate a Technical Specification Bases Control Program within the Millstone Unit No. 3 Technical Specifications. The amendment request is currently under NRC review.

3.1 Safety Evaluation

Conversion to Improved Technical Specification Format

Specifications 4.0.1 and 4.0.3 are being modified to be consistent with NUREG-1431, Revision 2, Surveillance Requirements 3.0.1 and 3.0.3. These changes are necessary to make the current Millstone Unit No. 3 Technical Specifications compatible with the proposed changes of TSTF-358, Revision 6. These changes are only administrative in nature.

Incorporation of TSTF-358, Revision 6

DNC has reviewed the proposed NRC safety evaluation dated June 14, 2001, as modified in response to the comments noticed on September 28, 2001, as part of the CLIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-358. DNC has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Millstone Unit No. 3 and justify this amendment for incorporation of the changes to the Millstone Unit No. 3 Technical Specifications.

Incorporation of Bases Control Program

DNC will be implementing the Bases Control Program for Millstone Unit No. 3 once the NRC approves our license amendment request dated November 8, 2001. This change is only administrative in nature.

4. REGULATORY ANALYSIS

4.1 No Significant Hazards Consideration

In accordance with 10 CFR 50.92, DNC has reviewed the proposed changes and has concluded that they do not involve a Significant Hazards Consideration (SHC). The following is provided in support of this conclusion.

Conversion to Improved Technical Specification Format

The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. These modifications involve no technical changes to the existing Technical Specifications. As such, these changes are administrative in nature and do not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, these changes will not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

The proposed change involves rewording of the existing Technical Specifications to be consistent with NUREG-1431, Revision 2. The changes are administrative in nature and will not involve any technical changes. The changes will not reduce a margin of safety because they

have no impact on any safety analysis assumptions. Also, since these changes are administrative in nature, no question of safety is involved. Therefore, there will be no reduction in a margin of safety.

Incorporation of TSTF-358, Revision 6

DNC has reviewed the no significant hazards consideration determination published in the Federal Register as part of the CLIP. DNC has concluded that the determination presented in the Federal Register notice is applicable to Millstone Unit No. 3 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

Incorporation of Bases Control Program

In a letter dated November 8, 2001, DNC submitted a license amendment request to incorporate a Bases Control Program within the Millstone Unit No. 3 Technical Specifications. Pursuant to the provisions of 10 CFR 50.92, it was concluded that the proposed changes contained in the amendment request did not involve a Significant Hazards Considerations.

4.2 Verification and Commitments

As discussed in the Notice of Availability published in the Federal Register on September 28, 2001, for this Technical Specification improvements, plant-specific verifications were performed as follows: DNC will implement changes to Technical Specification Bases for Specification 4.0.3, which state that the use of the delay period established for 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 a missed surveillance.

The modification will also include changes to the Bases for Specification 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 DNC 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 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 state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that a missed surveillance for an important

component should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the course of action. In addition, the Bases state that all missed surveillance tests will be placed in the licensee's corrective action program. DNC will establish the Technical Specification Bases for Specification 4.0.3 as adopted with this license amendment (see Attachment 4). Finally, DNC will implement a Bases Control Program once NRC approves our license amendment request dated November 8, 2001.

5. ENVIRONMENTAL EVALUATION

Conversions to Improved Technical Specification Format

DNC has evaluated the proposed changes against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.22. DNC has determined that the proposed changes meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exists in accordance with 10 CFR 50.92(b). This determination is based on the fact that the changes are being proposed as an amendment to a license issued pursuant to 10 CFR 50 to revise Specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2 and that the amendment request meets the following specific criteria:

- (i) The propose change involves no significant hazards consideration.

As demonstrated above, the proposed changes do not involve a significant hazards consideration.

- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released off site.

The proposed changes will revise Specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2. The proposed changes will not change the design basis of the plant. The proposed changes will not result in an increase in power level, will not increase the production of radioactive waste and byproducts, and will not alter the flowpath or method of disposal of radioactive waste or byproducts. Therefore, the proposed changes will not increase the types and amounts of effluents that may be released off site.

- (iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in changes in the configuration of the facility. The proposed changes will only revise specifications 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2. There will be no changes in the level of controls or methodology used for processing radioactive effluents or the handling of solid radioactive waste. There will be no change to the normal radiation levels within the plant. Therefore, there will be no increase in

individual or cumulative occupational radiation exposure resulting from the proposed changes.

Incorporation of TSTF-358, Revision 6

DNC has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001, as part of the CLIP. DNC has concluded that the staff's findings presented in that evaluation are applicable to Millstone Unit No. 3 and the evaluation is hereby incorporated by reference for this application.

Incorporation of Bases Control Program

In a letter dated November 8, 2001, DNC submitted a license amendment request to incorporate a Bases Control Program within the Millstone Unit No. 3 Technical Specifications. The amendment request concluded that the proposed request met the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Thus, pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement needs to be prepared in connection with the issuance of that amendment.

Attachment 2

Millstone Nuclear Power Station, Unit No. 3

License Basis Document Change Request 3-3-02
Missed Surveillances

Using Consolidated Line Item Improvement Process (CLIP)
Marked Up Pages

License Basis Document Change Request 3-3-02
Missed Surveillances
Using Consolidated Line Item Improvement Process (CLIIP)
Marked Up Pages

Technical Specification Section Number	Section Title	Affected Pages with Amendment Number
Specification 4.0.1 and 4.0.3	Applicability - Surveillance Requirements	3/4 0-1 and 3/4 0-2 Amend. No. 179
Base Specification 4.0.1	Applicability - Surveillance Requirements	B 3/4 0-4 Amend. No. 122
Base Specification 4.0.3	Applicability - Surveillance Requirements	B 3/4 0-4 Amend. No. 122 B 3/4 0-5 Amend. No. 57

NOTE TO THE REVIEWER:

- The Inserts are made to incorporate standard improved technical specification language into the current Millstone No. 3 Technical Specifications.
- Italicized formatting is used to identify CLIIP - related changes.

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.5.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals, except as provided in Specification 3.0.5. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODE 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permit continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative controls to perform the testing required to demonstrate OPERABILITY.

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

INSERT 'A' to page 3/4 0-1 (Specification 4.0.1)

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 interval, 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 'B' to page 3/4 0-2 (Specification 4.0.3)

If it is discovered that a surveillance was not performed within its specified surveillance interval, then the 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 interval, whichever is <<CLIP>> *greater*. This delay period is permitted to allow performance of the surveillance. <<CLIP>> *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 condition(s) 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 Condition(s) must be entered.

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

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

Delete and Replace with 'B'

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 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 MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 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:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities;

BASES

"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 MODES 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 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 a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance requirements do not have to be performed when the facility is in an OPERATIONAL MODE 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.

→ INSERT 'D'

Specification 4.0.2 This specification 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 specified to be performed at least once each REFUELING INTERVAL. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed once each REFUELING INTERVAL. 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 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.

Delete and Replace with INSERT 'E'

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 the Surveillance Requirements have not

INSERT 'C' to page B 3/4 0-4 (Specification 4.0.1)

Failure to meet a surveillance within the specified surveillance interval, in accordance with Specification 4.0.2, constitutes a failure to meet an Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE, when the associated Surveillance Requirements 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 Surveillance Requirements; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

INSERT 'D' to page B 3/4 0-4 (Specification 4.0.1)

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

Surveillance 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 MODE 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 a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressure > 800 psi. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.
- b. High pressure safety injection (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operations to reach the specified pressure to complete the necessary post maintenance testing.

INSERT 'E' to page B 3/4 0-4 (Specification 4.0.3)

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 interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is <<CLIP Change>> ~~less~~ 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 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 Action requirements or other remedial measures that might preclude completion of the Surveillances.

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 results of any particular Surveillance being performed is the verification of conformance with the requirements. <<CLIP>> ~~When a Surveillance with a surveillance interval based on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

~~Specification 4.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.~~

<<CLIP Change>> *When a Surveillance with a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations, (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified surveillance 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 MODE changes imposed by Required Actions.

Failure to comply with specified surveillance interval for the Specification is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Requirement 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. <<CLIP Change>> *While up to 24 hours or the limit of the specified surveillance interval is provided to perform 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 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillance 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 entry into the ACTION requirements for the applicable Limiting Conditions for Operation begins immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and entry into the ACTION requirements for the applicable Limiting Conditions for Operation begins immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time of the applicable ACTIONS, restores compliance with Specification 4.0.1.

3/4.0 APPLICABILITYBASES*Delete and
Insert E'*

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 a violation of the OPERABILITY requirements of a Limiting Condition for Operation.

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 is required to comply with ACTION requirements or before other remedial measures would be required that may preclude 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. 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 MODE 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 a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES 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.

Attachment 3

Millstone Nuclear Power Station, Unit No. 3

License Basis Document Change Request 3-3-02

Missed Surveillances

Using Consolidated Line Item Improvement Process (CLIP)

Retyped Pages

3/4 LIMITING CONDITION FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.5.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals, except as provided in Specification 3.0.5. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODE 5 or 6.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permit continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative controls to perform the testing required to demonstrate OPERABILITY.

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to meet a surveillance, whether such failure is experienced during the performance

3/4 LIMITING CONDITION FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4 APPLICABILITY

LIMITING CONDITION FOR OPERATION

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 interval, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillance 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 time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it discovered that a surveillance was not performed within its specified surveillance interval, then the 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 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 condition(s) 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 Condition(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 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:

APPLICABILITY

LIMITING CONDITION FOR OPERATION (Continued)

ASME Boiler and Pressure Vessel
Code and applicable Addenda
terminology for inservice
inspection and testing activities

Required frequencies for
performing inservice
inspection and testing
activities

Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities;
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements; and
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

3/4.0 APPLICABILITY

BASES

"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 MODES 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 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 a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Failure to meet a surveillance within the specified surveillance interval, in accordance with Specification 4.0.2, constitutes a failure to meet an Limiting Condition for Operation.

Systems and components are assumed to be OPERABLE, when the associated Surveillance Requirements 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 Surveillance Requirements; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillance requirements do not have to be performed when the facility is in an OPERATIONAL MODE 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.

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

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillance 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 MODE 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 a MODE or other specified condition where other necessary post maintenance tests can be completed.

BASES

Some examples of this process are:

- a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressure > 800 psi. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.
- b. High pressure safety injection (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operations to reach the specified pressure to complete the necessary post maintenance testing.

Specification 4.0.2 This specification 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 specified to be performed at least once each REFUELING INTERVAL. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed once each REFUELING INTERVAL. 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 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 interval. A delay period of up to 24 hours or up to the limit of the specified surveillance 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 interval was not met.

This delay period provides adequate time to complete Surveillance 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 results of any particular Surveillance being performed is the verification of conformance with the requirements.

BASES

When a Surveillance with a surveillance interval based not on time intervals, but upon unit conditions, operating situations, or requirements of regulations, (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified surveillance 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 MODE changes imposed by Required Actions.

Failure to comply with specified surveillance interval for the Specification is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Requirement 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 interval is provided to perform 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 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillance 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 entry into the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and entry into the ACTION requirements for the applicable Limiting Condition for Operation begins immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Allowed Outage Time of the applicable ACTIONS, restores compliance with Specification 4.0.1.

3/4.0 APPLICABILITY

BASES

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE 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 a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES 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 MODE 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 10CFR50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

Attachment 4

Millstone Nuclear Power Station, Unit No. 3

License Basis Document Change Request 3-3-02
Missed Surveillances

Using Consolidated Line Item Improvement Process (CLIP)
List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies action committed to by DNC in this document.

Number	Commitment	Due
B18610-01	DNC will establish the Technical Specification Bases for Specification 4.0.3 as adopted with the applicable license amendment.	To be implemented with amendment.