



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402-2801

September 3, 2002

TVA-BFN-TS-408
TVA-SQN-TS-02-04
TVA-WBN-TS-02-06

10 CFR 50.90

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

Gentlemen:

In the Matter of)	Docket Nos.	50-259
Tennessee Valley Authority)		50-260
			50-296
			50-327
			50-328
			50-390

APPLICATION FOR TECHNICAL SPECIFICATION (TS) CHANGE - MISSED SURVEILLANCES USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

In accordance with the provisions of 10 CFR 50.90, Tennessee Valley Authority (TVA) is submitting a request for amendments to Browns Ferry Nuclear (BFN) Plant's license DPR-33 for Unit 1, license DPR-52 for Unit 2, license DPR-68 for Unit 3; Sequoyah Nuclear (SQN) Plant's license NPR-77 for Unit 1 and license NPR-79 for Unit 2; and Watts Bar Nuclear (WBN) Plant's license NPF-90 to change their respective TS. The proposed changes will modify Surveillance Requirement (SR) 3.0.3 for BFN Units 1, 2, and 3, and WBN Unit 1 to allow a delay period of 24 hours or up to the surveillance frequency interval, whichever is greater, and to require a risk analysis be performed for any surveillance delayed greater than 24 hours. These changes adopt NRC-approved Technical Specification Task Force (TSTF) item TSTF-358, Revision 6. The availability of this TS improvement was published in the *Federal Register (FR)* on September 28, 2001 (*FR* Notice 66 FR 49714) as part of the Consolidated Line Item Improvement Process (CLIIP).

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Due to the vintage of SQN's TS, incorporation of this CLIP will entail additional changes. These additional changes are necessary to make the current SQN TS compatible with the proposed changes of TSTF-358 and to add a Bases Control Program which is a requirement of the CLIP. For SQN Units 1 and 2, TVA proposes three separate changes to their TS: (1) to modify the wording of the current SR 4.0.1 and 4.0.3 to be consistent with NUREG-1431, Revision 2, wording for SR 3.0.1 and SR 3.0.3; (2) to modify the current TS 6.8, adding a new subsection 6.8.j, which will include the NUREG 1431, Revision 2, wording for TS 5.5.14 which discusses the TS Bases Control Program; and (3) to modify the Improved Standard TS wording, adopted in item 1 above, to allow a delay period of 24 hours or up to the surveillance frequency interval, whichever is greater, and to require a risk analysis to be performed for any surveillance delayed greater than 24 hours (TSTF 358, Revision 6). In adopting the NUREG-143, Revision 2, TS Bases Control Program, SQN will also conform to the Improved STS wording adopted in TSTF-364, Revision 1, that had already been incorporated into NUREG-1431, Revision 2.

TVA has determined that there are no significant hazards considerations associated with the proposed change and that the change is exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). The Plant Operations Review Committee and Nuclear Safety Review Board at the respective sites have reviewed this proposed change and have determined that operation of their site, in accordance with the proposed change, will not endanger the health and safety of the public. Additionally, in accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosures to the Alabama and Tennessee State Departments of Public Health.

Enclosure 1 to this letter provides the description and evaluation of the proposed change, including TVA's determination that the proposed change does not involve a significant hazards consideration and is exempt from environmental review for BFN and WBN license amendments. Enclosure 2 contains similar information for SQN license amendments. Enclosures 3 through 8 contains copies of the appropriate TS pages marked to show the proposed change. Enclosures 9 through 14 forward the revised TS pages which incorporate the proposed change.

While no specific schedule need exists, TVA requests approval for these changes as soon as practicable and that the implementation of the revised TS be within 45 days of NRC approval.

A similar license amendment request was submitted by Detroit Edison for GE BWR Fermi 2. This request was submitted in letter NRC-01-0074 dated November 11, 2001, and was granted in your January 25, 2002 letter that issued Amendment 145 to License NPF-43. On December 10, 2001, STP Nuclear Operating Company submitted an

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amendment change for South Texas Project Units 1/2 licenses which utilize language that is similar to SQN 1 and 2 licenses. The STP submittal was revised by a May 23, 2002 letter NOC-AE-02001268, which provided additional wording changes and clarification to improve its consistency with NUREG 1431. This amendment request approval is still pending. TVA reviewed these previous requests in the preparation of our current request.

There are no commitments contained within this submittal.

If you have any questions about this change, please contact Susan Ferrell at (423) 751-7737.

Pursuant to 28 U.S.C. § 1746 (1994), I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,


Mark J. Burzynski
Manager
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Enclosures

cc (Enclosures):

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cc: Continued on page 4

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY (TVA)

BROWNS FERRY NUCLEAR PLANT (BFN)

UNIT 1

DOCKET NO. 50-259

BROWNS FERRY NUCLEAR PLANT

UNIT 2

DOCKET NO. 50-260

BROWNS FERRY NUCLEAR PLANT

UNIT 3

DOCKET NO. 50-296

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408

WATTS BAR NUCLEAR PLANT (WBN)

UNIT 1

DOCKET NO. 50-390

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-06

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

The proposed amendment will modify TS requirements for missed surveillances in Surveillance Requirements (SR) 3.0.3.

The changes are consistent with the Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-358 Revision 6. The availability of this TS improvement was published in the *Federal Register (FR)* on September 28, 2001 (*FR* Notice 66 FR 49714) as part of the Consolidated Line Item Improvement Process (CLIIP).

The specific TS changes which TVA proposes are shown by the marked pages of the BFN Units 1, 2, and 3, and WBN Unit 1 TS provided in Enclosure 3, 4, 5, and 8 respectively. Enclosures 9, 10, 11, and 14 forward the revised TS pages which incorporate the proposed change.

II. REASON FOR THE PROPOSED CHANGE

Surveillances which have a frequency less than 24 hours can typically be performed when missed because they are frequent, typically straightforward, monitoring activities. There are other surveillances that cannot be adequately performed in 24 hours. Performance of surveillances requires planning, personnel, preparation, and appropriate plant conditions. Some surveillances, when discovered missed, may require a change in the state or MODE of the facility to perform the surveillance. When faced with a missed surveillance that may require a change in state or MODE, a licensee would have to either (1) declare the limiting condition for operation not met and enter the actions, which could ultimately require a plant shutdown, (2) determine a method to perform the SR in the current state or MODE, or (3) request a Notice of Enforcement Discretion (NOED); all potentially in the space of 24 hours.

A survey of licensees indicates that in the 1996 to present time frame, more than 10 NOEDs regarding missed surveillances have been processed. In some cases, the approval of the NOED was followed by a NRC request for an exigent TS change. This is an unnecessary use of NRC and industry resources. The basis for approval of the NOEDs was (1) the historical reliability of the component or system during past Surveillance testing, (2) the likelihood that the surveillance will pass when performed, and (3) for surveillances that can be performed at power, the short time period requested for extension. These arguments are equally applicable to the proposed change.

III. SAFETY ANALYSIS

Applicability of Published Safety Evaluation:

The proposed changes revise TS SR 3.0.3 for BFN 1, 2, and 3 and WBN 1 to allow a delay period of 24 hours or up to the surveillance frequency interval, whichever is greater. These changes are necessary to make the respective sites' TS compatible with the proposed changes of TSTF-358, Revision 6.

TVA has reviewed the proposed NRC Safety Evaluation dated June 14, 2001 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting documentation provided to support the TSTF. TVA has concluded that the justifications presented in the TSTF and the Safety Evaluation prepared by the NRC are applicable to BFN 1, BFN 2, BFN 3, and WBN 1 and justify this amendment for the incorporation of changes to their respective TS.

Optional Changes and Variations:

TVA is not proposing any variations or deviations from the TS change described in TSTF-358, Revision 6, or the NRC staff's model safety evaluation dated June 14, 2001 as modified in response to comments noticed in the *FR* on September 28, 2001.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Applicability of Published No Significant Hazards Consideration Determination:

TVA has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *FR* as part of the CLIIP for TSTF-358. TVA has concluded that the proposed NSHCD in the *FR* notice is applicable to BFN 1, 2, and 3, and WBN 1 and is hereby incorporated by reference to satisfy the requirements of 10CFR 50.91 (a).

Verification and Commitments:

As discussed in the notice of availability published in the *FR* on September 28, 2001, for this TS improvements, plant-specific verifications were performed as follows:

This license amendment will include a change to the Bases for SR 3.0.3 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 the specific unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that the licensee is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on the plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases states 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." The Bases states 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. The missed surveillances for important components should be analyzed quantitatively. The Bases state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the licensee's Corrective Action Program. Finally, BFN and WBN have Bases Control Programs that are consistent with Improved STS.

V. ENVIRONMENTAL IMPACT CONSIDERATION

The proposed TS changes do not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY (TVA)

SEQUOYAH NUCLEAR PLANT (SQN)

UNIT 1

DOCKET NO. 50-327

SEQUOYAH NUCLEAR PLANT

UNIT 2

DOCKET NO. 50-328

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-04

DESCRIPTION AND EVALUATION OF THE PROPOSED CHANGE

I. DESCRIPTION OF THE PROPOSED CHANGE

Adoption of NUREG 1431, Revision 2, SR 3.0.1 and 3.0.3 Wording

TVA proposes to modify SQN's license NPR-77 for Unit 1, license NPR-79 for Unit 2, TS wording in Specifications 4.0.1 and 4.0.3 to be consistent with NUREG 1431, Revision 2, wording for the similar TS, which are contained in Surveillance Requirements (SR) 3.0.1 and 3.0.3 in the Improved Standard TS (STS). These changes are necessary in order to make the current SQN Units 1 and 2 TS compatible with the proposed changes of the Technical Specification Task Force (TSTF) item TSTF-358, Revision 6.

Adoption of NUREG 1431, Revision 2 TS Bases Control Program

SQN Unit 1 and Unit 2 TS do not currently contain a requirement for a TS Bases control program. In order to implement the Consolidated Line Item Improvement Process (CLIIP) for TSTF-358, TVA proposes that the SQN Unit 1 and Unit 2 TS Section 6.8 be modified to include the Improved STS wording from NUREG 1431, Revision 2, TS 5.5.14, "Technical Specification Bases Control Program." In adopting the NUREG-1431, Revision 2, TS Bases Control Program, SQN will also conform to the improved TS worded adopted in TSTF-364, Revision 1, that has been incorporated into NUREG-1431, Revision 2.

Adoption of TSTF 358, Revision 6 - Missed Surveillances

For SQN, which has not implemented the Improved STS, similar requirements are contained in Specification 4.0.3. SQN Specification 4.0.1 and 4.0.3 (and the associated Bases sections) will be revised to adopt wording consistent with

NUREG-1431, Revision 2, and then modified to contain wording similar with that approved in TSTF-358, Revision 6. Slight changes were necessary in the adoption of the TSTF into SQN's TS due to the difference in terminology that has been adopted with the Improved STS.

The changes are otherwise consistent with the Nuclear Regulatory Commission (NRC) approved Industry/TSTF STS change, TSTF-358, Revision 6. The availability of this TS improvement was published in the *Federal Register (FR)* on September 28, 2001 (*FR* Notice 66 FR 49714) as part of the CLIP.

The specific TS changes which TVA proposes are shown by the marked pages of the SQN 1 and SQN 2 TS, provided in Enclosure 6 and 7 respectively. Enclosures 12 and 13 forward the revised TS pages which incorporate the proposed change.

II. REASON FOR THE PROPOSED CHANGE

Adoption of NUREG 1431, Revision 2, SR 3.0.1 and 3.0.3 Wording and the TS Bases Control Program

To ensure that the overall change, including the Bases, includes the appropriate regulatory controls, the NRC has conditioned the issuance of each license amendment on incorporation of the changes into the Bases document and on requiring the licensee to control the changes in accordance with the Bases Control Program. Prior to the issuance of the Improved STS (NUREGS-1430–1434), the control of TS Bases was not clearly defined by either TS or NRC regulations. The administrative requirements for a Bases control program were added to the Improved STS to define a methodology for evaluating changes to and providing updates of the TS Bases. The addition of the TS Bases Control Program for SQN provides the same benefits currently in place at SQN in administrative procedures and only serves to clarify these attributes in the TS.

Adoption of TSTF 358, Revision 6 - Missed Surveillances

Surveillances which have a frequency less than 24 hours can typically be performed when missed because they are frequent, typically straightforward, monitoring activities. There are other surveillances that cannot be adequately performed in 24 hours. Performance of surveillances requires planning, personnel, preparation, and appropriate plant conditions. Some surveillances, when discovered missed, may require a change in the state or MODE of the facility to perform the surveillance. When faced with a missed surveillance that may require a change in state or MODE, a licensee would have to either (1) declare the limiting condition of operation not met and enter the actions, which could ultimately require a plant shutdown, (2) determine a method to perform the SR in the current state or MODE, or (3) request a Notice of Enforcement Discretion (NOED); all potentially in the space of 24 hours.

A survey of licensees indicates that in the 1996 to present time frame, more than 10 NOEDs regarding missed surveillances have been processed. In some cases, the approval of the NOED was followed by a NRC request for an exigent TS change. This is an unnecessary use of NRC and industry resources. The basis for approval of the NOEDs was (1) the historical reliability of the component or system during past Surveillance testing, (2) the likelihood that the surveillance will pass when performed, and (3) for surveillances that can be performed at power, the short time period requested for extension. These arguments are equally applicable to the proposed change.

III. **SAFETY ANALYSIS**

Adoption of NUREG 1431, Revision 2, SR 3.0.1 and 3.0.3 Wording

Specification 4.0.1 and 4.0.3 are being modified to be consistent with NUREG-1431, Revision 2, Surveillance Requirement 3.0.1 and 3.0.3. These changes are necessary to make the current SQN Units 1 and 2 TS compatible with the proposed changes of TSTF-358, Revision 6. These changes are administrative in nature. They will have no impact on the design, function, or operation of any plant structure, system, or component, either technically or administratively.

Adoption of NUREG 1431, Revision 2, TS Bases Control Program

SQN Units 1 and 2 have not implemented the Improved Technical Specifications and therefore, as required by the CLIP for TSTF-358, SQN Units 1 and 2 TS 6.8 will be modified to add subsection 6.8.j which will contain the NUREG 1431, Revision 2, STS wording for a Bases Control Program. This change is administrative in nature. The change will have no impact on the design, function, or operation of any plant structure, system, or component, either technically or administratively.

TSTF 358, Revision 6 - Missed Surveillances

Applicability of Published Safety Evaluation:

The proposed changes revise Specification 4.0.3 for SQN Units 1 and 2 to allow a delay period of 24 hours or up to the surveillance frequency interval, whichever is greater. These changes are necessary to make the respective sites' TS compatible with the proposed changes of TSTF-358, Revision 6.

TVA has reviewed the proposed NRC Safety Evaluation dated June 14, 2001 as part of the CLIP. This review included a review of the NRC staff's evaluation, as well as the supporting documentation provided to support the TSTF. TVA has concluded that the justifications presented in the TSTF and the Safety Evaluation prepared by the NRC are applicable to SQN Units 1 and 2, and justify this amendment for the incorporation of changes to their respective TS.

Optional Changes and Variations:

For SQN 1 and 2 TS changes and the associated Bases, the TSTF-358 Revision 6, wording is being adopted into the Specification 4.0.3 following the adoption of the Improved STS Specification 3.0.1 and 3.0.3 wording in place of their current Specification 4.0.1 and 4.0.3. The only exception to the adoption of exact TSTF-358 Revision 6, proposed wording were due to the different terminology used in the SQN Units 1 and 2 TS.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

TVA has concluded that operation of SQN Units 1 and 2, in accordance with the proposed change to their respective technical specifications, does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation, in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c).

Adoption of NUREG 1431, Revision 2, for SR 3.0.1 and 3.03 Wording

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

The proposed change involves rewording of the existing Specification 4.0.1 and 4.0.3 to be consistent with NUREG 1431, Revision 2. These modifications involve no technical changes to the existing TS. This change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change involves rewording of the existing Specification 4.0.1 and 4.0.3 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 installed) or changes in the methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the probability of a new or different kind of accident from any accident previously evaluated.

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

The proposed change involves rewording of the existing Specification 4.0.1 and 4.0.3 to be consistent with NUREG 1431, Revision 2. The change is administrative in nature and will not involve any technical changes. The change will not reduce a margin of safety because it has no impact on any

safety analysis assumptions. Since this change is administrative in nature, no question of safety is involved. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Adoption of NUREG 1431, Revision 2, Technical Specification Bases Control Program

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

The proposed change involves incorporation of the NUREG 1431, Revision 2, Bases Control Program requirements into the SQN Units 1 and 2 TS. This change involves no technical change to existing TS, it simply adds wording on how the bases section of the TS will be maintained and controlled. This change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change involves incorporation of the NUREG 1431, Revision 2, Bases Control Program requirements into the SQN Units 1 and 2 TS. The change does not involve a physical alteration of the plant (no new or different type of equipment installed) or changes in the methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the probability of a new or different kind of accident from any accident previously evaluated.

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

The proposed change involves incorporation of the NUREG 1431, Revision 2, Bases Control Program requirements into SQN Units 1 and 2 TS. The change is administrative in nature and will not involve any technical changes. The change will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Since this change is administrative in nature, no question of safety is involved. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Adoption of TSTF 358, Revision 6 - Missed Surveillances

Applicability of Published No Significant Hazards Consideration Determination:

TVA has reviewed the proposed no significance hazards consideration determination (NSHCD) published in the *FR* as part of the CLIIP for TSTF-358. TVA has concluded that the proposed NSHCD in the *FR* notice is applicable to SQN Units 1 and 2 and is hereby incorporated by reference to satisfy the requirements of 10CFR 50.91 (a).

Verification and Commitments:

As discussed in the notice of availability published in the *FR* on September 28, 2001, TS improvements, plant-specific verifications were performed as follows:

This license amendment will also include a change 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 the specific unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that the licensee is expected to perform a missed surveillance test at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on the 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 states that the risk impact should be managed through the program in place to implement 1-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 the 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 missed surveillances for important components should be analyzed quantitatively. The Bases also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the licensee's Corrective Action Program. Finally, with this licensee amendment SQN will have a Bases Control Program that is consistent with Improved STS.

V. ENVIRONMENTAL IMPACT CONSIDERATION

The proposed TS changes do not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

ENCLOSURE 3

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 1**

**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
MARKED PAGES**

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-15
B 3.0-16

II. MARKED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

greater

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

(continued)

BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

greater

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.

(continued)

BASES

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

~~When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.~~

Insert 1

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE 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 SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

Insert 2

~~If a Surveillance is not completed within the allowed delay period,~~ then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

(continued)

BFN 1 Technical Specification Change Inserts to Bases SR 3.0.3

Insert 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Insert 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

ENCLOSURE 4

**TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2**

**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
MARKED PAGES**

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-15
B 3.0-16

II. MARKED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

greater

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

(continued)

BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is ~~less~~, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

greater

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.

(continued)

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Insert 1

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE 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 SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

Insert 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

(continued)

BFN 2 Technical Specification Change Inserts to Bases SR 3.0.3

Insert 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Insert 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

ENCLOSURE 5

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
MARKED PAGES

I. AFFECTED PAGE LIST

Page 3 0-4
B 3.0-15
B 3.0-16

II. MARKED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

greater

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

(continued)

BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

greater

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.

(continued)

BASES

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Insert 1

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE 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 SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals .

Insert 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

(continued)

BFN 3 Technical Specification Change Inserts to Bases SR 3.0.3

Insert 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Insert 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

ENCLOSURE 6

TENNESSEE VALLEY AUTHORITY
SEQUAYOH NUCLEAR PLANT (SQN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-04
MARKED PAGES

I. AFFECTED PAGE LIST

Page	3/4 0-2	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	B 3/4 0-3	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-3a	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-4	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	6-10B (New Page)	Adopt NUREG 1431 Rev 2 Wording

II. MARKED PAGES

Attached

APPLICABILITY

SURVEILLANCE REQUIREMENTS

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.

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

Insert 1

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

Insert 2

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

Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS.

APPLICABILITY

BASES

instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

3.0.6 LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCOs 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Required Action[s]) to allow the performance of SRs to demonstrate:

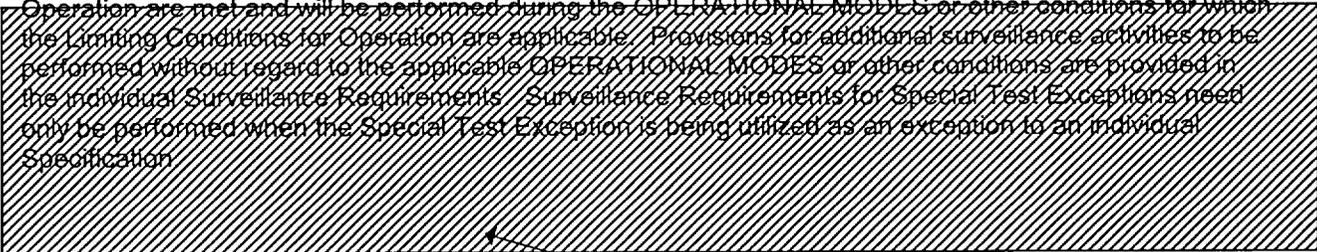
- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual Specification.



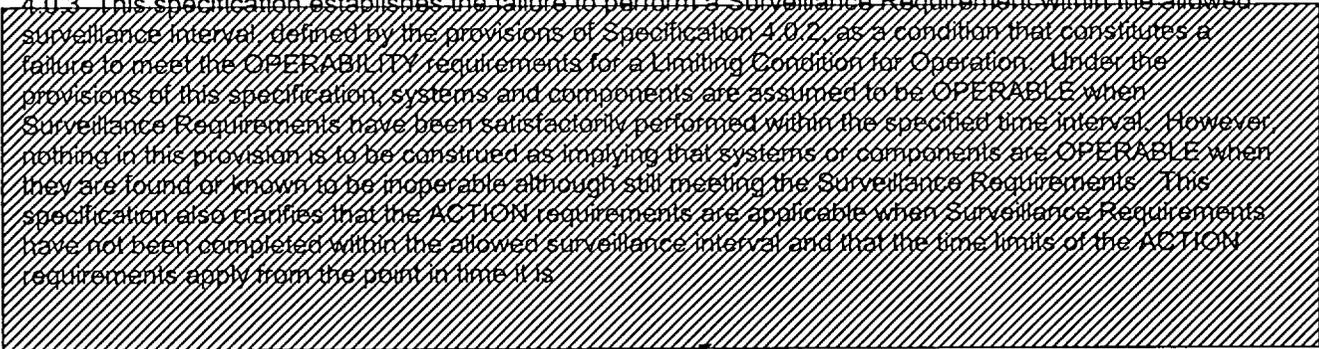
Insert 3

APPLICABILITY

BASES

4.0.2 Specification 4.0.2 established 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 18-month surveillance 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 during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement 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.

4.0.3 This specification 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



Delete

APPLICABILITY

BASES

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 that is subject to enforcement action.

If the allowable outage time limits of the ACTION requirement are less than 24 hours (the allowable outage time limits are defined as the first timeframe encountered in the ACTION requirement) 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. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE 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.

Insert 4

ADMINISTRATIVE CONTROLS

j. Technical Specification (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:
 - 1. A change in the TS incorporated in the license or
 - 2. A change to the updated FSAR 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 FSAR.
- d. Proposed changes that meet the criteria of Specification 6.8.j.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).

←

Inserted new Section 6.8.j on new page 6-10b.

SQN 1 Technical Specification Change Inserts

Insert 1 - TS 4.0.1

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, 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 Conditions 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 - TS 4.0.3

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval (including the 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 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(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 ACTION(s) must be entered.

Insert 3 - Bases 4.0.1

4.0.1 SR 4.0.1 establishes the requirement that surveillances must be met during the OPERATIONAL MODES or other specified conditions in the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirement. The purposes of this Specification is to ensure that Surveillances are performed to verify the operational status of systems and components and that variables are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which associated Limiting Condition for Operation are applicable.

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.

SQN 1 Technical Specification Change Inserts - Continued

Surveillances do not have to be performed when the unit is in a 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.

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 the inoperable equipment has been restored to OPERABLE status.

Insert 4 - Bases 4.0.3

4.0.3 SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limit when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified 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 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 the 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 frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, 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 the 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.

SQN 1 Technical Specification Change Inserts - Continued

While up to 24 hours or the limit of the specified surveillance 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 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specification 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 the entry into the ACTION requirements or 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 ACTIONS, restores compliance with Specification 4.0.3.

ENCLOSURE7

TENNESSEE VALLEY AUTHORITY
SEQUAYOH NUCLEAR PLANT (SQN)
UNIT 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-04
MARKED PAGES

I. AFFECTED PAGE LIST

Page	3/4 0-2	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	B 3/4 0-3	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-3a	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-4	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	6-7	Adopt NUREG 1431 Rev 2 Wording
	6-7a (New Page)	Adopt NUREG 1431 Rev 2 Wording

II. MARKED PAGES

Attached

APPLICABILITY

SURVEILLANCE REQUIREMENTS

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 1

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

Insert 2

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 have been performed within the specified 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:

Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS

3.0.5 (Continued)

specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

3.0.6 LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCOs 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Required Action[s]) to allow the performance of SRs to demonstrate:

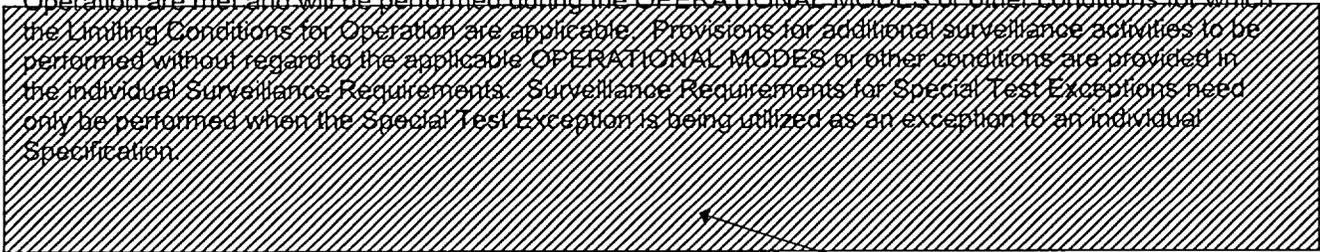
- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the operability of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

4.0.1 This specification provides that surveillance activities necessary to insure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual Specification.



Insert 3

APPLICABILITY

BASES

4.0.2 Specification 4.0.2 established 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 18-month surveillance 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 during refueling outages. 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.

~~4.0.3 This specification 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~~

Delete

4.0.3 (Continued)

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 that is subject to enforcement action.

If the allowable outage time limits of the ACTION requirement are less than 24 hours (the allowable outage time limits are defined as the first timeframe encountered in the ACTION requirement) 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. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE 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.

Insert 4

ADMINISTRATIVE CONTROLS

b. Air lock testing acceptance criteria are:

- 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
- 2) For each door, leakage rate is $\leq 0.01 L_a$ when pressurized to ≥ 6 psig for at least two minutes

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

The provisions of SR 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

i. Configuration Risk Management Program

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to Technical Specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program shall include the following elements:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the Limiting Condition for Operation (LCO) Action for preplanned activities.
- c. Provisions for performing an assessment after entering the LCO Action for unplanned entry into the LCO Action.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Action.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues and external events, qualitatively or quantitatively.

j. 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:
 1. A change in the TS incorporated in the license or
 2. A change to the updated FSAR 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 FSAR.

July 1, 1998

ADMINISTRATIVE CONTROLS

- d. Proposed changes that meet the criteria of Specification 6.8.j 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)

6.9 REPORTING REQUIREMENTS

Insert new Section 6.8.j.

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 DELETED

6.9.1.2 DELETED

6.9.1.3 DELETED

SQN 2 Technical Specification Change Inserts

Insert 1 - TS 4.0.1

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, 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 Conditions 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 - TS 4.0.3

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval (including the 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 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(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 ACTION(s) must be entered.

Insert 3 - Bases 4.0.1

4.0.1 SR 4.0.1 establishes the requirement that surveillances must be met during the OPERATIONAL MODES or other specified conditions in the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirement. The purposes of this Specification is to ensure that Surveillances are performed to verify the operational status of systems and components and that variables are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which associated Limiting Condition for Operation are applicable.

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.

SQN 2 Technical Specification Change Inserts - Continued

Surveillances do not have to be performed when the unit is in a 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.

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 the inoperable equipment has been restored to OPERABLE status.

Insert 4 - Bases 4.0.3

4.0.3 SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limit when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified 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 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 the 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 frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, 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 A ACTIONS.

Failure to comply with the 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.

SQN 2 Technical Specification Change Inserts - Continued

While up to 24 hours or the limit of the specified surveillance 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 10 CFR 50 65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specification 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 the entry into the ACTION requirements or 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 ACTIONS, restores compliance with Specification 4.0.3.

ENCLOSURE 8

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-06
MARKED PAGES

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-12
B 3.0-13

II. MARKED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

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

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

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the Surveillance.

greater

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

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

(continued)

BASES

SR 3.0.2 (continued) Program, that SR 3.0.2 does not apply. This exception is provided because the program already includes extension of test intervals.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per . . ." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3 SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours ~~or up to the limit of the specified Frequency, whichever is less,~~ applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

greater

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

(continued)

BASES

SR 3.0.3
(continued)

required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.) When a Surveillance with a Frequency based

not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

Inset 1

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE 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 SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

Inset 2

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure

(continued)

WBN 1 Technical Specification Change Inserts to Bases SR 3.0.3

Insert 1

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Insert 2

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

ENCLOSURE 9

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
REVISED PAGES

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-15
B 3.0-16
B 3.0-16a (New Page)

II. REVISED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is 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.

(continued)

BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

(continued)

BASES

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis 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

(continued)

BASES

SR 3.0.3

(continued)

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

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

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ENCLOSURE 10

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
REVISED PAGES

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-15
B 3.0-16
B 3.0-16a (New Page)

II. REVISED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is 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.

(continued)

BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

(continued)

BASES

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis 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

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BASES

SR 3.0.3

(continued)

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

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

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ENCLOSURE 11

TENNESSEE VALLEY AUTHORITY
BROWNS FERRY NUCLEAR PLANT (BFN)
UNIT 3

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-408
REVISED PAGES

I. AFFECTED PAGE LIST

Page 3 0-4
B 3.0-15
B 3.0-16
B 3.0-16a (New Page)

II. REVISED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

For Frequencies specified as "once," the above interval extension does not apply. If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is 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.

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BASES

SR 3.0.2
(continued)

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

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BASES

SR 3.0.3
(continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis 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

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BASES

SR 3.0.3
(continued)

Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

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ENCLOSURE 12

TENNESSEE VALLEY AUTHORITY
SEQUAYOH NUCLEAR PLANT (SQN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-04
REVISED PAGES

I. AFFECTED PAGE LIST

Page	3/4 0-2	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	B 3/4 0-3	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-3a	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-4	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	6-10b (New Page)	Adopt NUREG 1431 Rev 2 Wording

II. REVISED PAGES

Attached

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, 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 Conditions 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 interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval (including the 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 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(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 ACTION(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 have been performed within the specified 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 as follows:

Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c.4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS.

APPLICABILITY

BASES

instead, provided the other specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to

3.0.6 LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCOs 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Required Action[s]) to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

4.0.1 SR 4.0.1 establishes the requirement that surveillances must be met during the OPERATIONAL MODES or other specified conditions in the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirement. The purposes of this Specification is to ensure that Surveillances are performed to verify the operational status of systems and components and that variables are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which associated Limiting Condition for Operation are applicable.

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.

APPLICABILITY

BASES

Surveillances do not have to be performed when the unit is in a 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.

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 the inoperable equipment has been restored to OPERABLE status.

4.0.2 Specification 4.0.2 established 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 18-month surveillance 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 during refueling outages. 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.

4.0.3 SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limit when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified 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 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 the 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 frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, 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.

APPLICABILITY

BASES

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

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specification 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 the entry into the ACTION requirements or 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 ACTIONS, restores compliance with Specification 4.0.3.

ADMINISTRATIVE CONTROLS

J Technical Specification (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:
 1. A change in the TS incorporated in the license or
 2. A change to the updated FSAR 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 FSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.14b 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).

ENCLOSURE 13

TENNESSEE VALLEY AUTHORITY
SEQUAYOH NUCLEAR PLANT (SQN)
UNIT 2

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-04
REVISED PAGES

I. AFFECTED PAGE LIST

Page	3/4 0-2	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	B 3/4 0-3	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-3a	Adopt NUREG 1431 Rev 2 Wording
	B 3/4 0-4	Adopt NUREG 1431 Rev 2 Wording & TSTF 358
	6-7	Adopt NUREG 1431 Rev 2 Wording
	6-7a (New Page)	Adopt NUREG 1431 Rev 2 Wording

II. REVISED PAGES

Attached

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual Limiting Condition for Operation, unless otherwise stated in the individual Surveillance Requirement. Failure to meet a Surveillance Requirement, 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 Conditions 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 interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval (including the allowed extension per Specification 4.02), 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 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(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 ACTION(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 have been performed within the specified 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:

Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2 and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;
- b. The provisions of SR 4.0.2 are applicable to the frequencies for performing inservice inspection activities;
- c. Inspection of each reactor coolant pump flywheel per the recommendation of Regulation Position c 4.b of Regulatory Guide 1.14, Revision 1, August 1975 or in lieu of Position c.4.b(1) and c.4.b(2), a qualified in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the removed flywheels may be conducted at approximately 10-year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirement of any TS.

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3.0.5 (Continued)

specified conditions are satisfied. In this case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 or 6, Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

3.0.6 LCO 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCOs 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Required Action[s]) to allow the performance of SRs to demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the operability of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the SRs.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of an SR on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of an SR on another channel in the same trip system.

4.0.1 SR 4.0.1 establishes the requirement that surveillances must be met during the OPERATIONAL MODES or other specified conditions in the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillance Requirement. The purposes of this Specification is to ensure that Surveillances are performed to verify the operational status of systems and components and that variables are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which associated Limiting Condition for Operation are applicable.

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.

APPLICABILITY

BASES

Surveillances do not have to be performed when the unit is in a 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.

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 the inoperable equipment has been restored to OPERABLE status.

4.0.2 Specification 4.0.2 established 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 18-month surveillance 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 during refueling outages. 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.

4.0.3 SR 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limit when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified 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 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 the 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 frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, 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.

4.0.3 (Continued)

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

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specification 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 the entry into the ACTION requirements or 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 ACTIONS, restores compliance with Specification 4.0.3.

ADMINISTRATIVE CONTROLS

b Air lock testing acceptance criteria are

- 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
- 2) For each door, leakage rate is $\leq 0.01 L_a$ when pressurized to ≥ 6 psig for at least two minutes.

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

The provisions of SR 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

i. Configuration Risk Management Program

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to Technical Specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program shall include the following elements:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the Limiting Condition for Operation (LCO) Action for preplanned activities.
- c. Provisions for performing an assessment after entering the LCO Action for unplanned entry into the LCO Action.
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Action.
- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues and external events, qualitatively or quantitatively.

j. 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:
 1. A change in the TS incorporated in the license or
 2. A change to the updated FSAR 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 FSAR

- d Proposed changes that meet the criteria of Specification 5.5 14b 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)

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4.

STARTUP REPORT

6.9.1.1 DELETED

6.9.1.2 DELETED

6.9.1.3 DELETED

ENCLOSURE 14

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-02-06
REVISED PAGES

I. AFFECTED PAGE LIST

Page 3.0-4
B 3.0-12
B 3.0-13
B 3.0-13a (New Page)

II. REVISED PAGES

Attached

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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

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

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

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

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is 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 LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)

BASES

SR 3.0.2
(continued) Program, that SR 3.0.2 does not apply. This exception is provided because the program already includes extension of test intervals.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per . . ." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3 SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the

(continued)

BASES

SR 3.0.3
(continued)

required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity.

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

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis 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

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BASES

SR 3.0.3
(continued)

evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable 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 SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure

(continued)