4.0 SURVEILLANCE REQUIREMENTS

APPLICABILITY

a. Surveillance requirements shall be met during the operational MODES or other conditions specified for individual LIMITING CONDITIONS FOR OPERATION (LCO) unless otherwise stated in an 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 surveillances, shall be failure to meet the OPERABILITY requirements for the LCO. Failure to perform a surveillance within the allowed surveillance interval, defined by TS 4.0.b, shall be a failure to meet the OPERABILITY requirements for the LCO except as provided in TS 4.0.c. Surveillance requirements do not have to be performed on inoperable equipment.

b Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

c. If it is discovered that a surveillance was not performed within its allowed surveillance interval, then compliance with the requirement to declare the OPERABILITY requirements for the LCO not met may be delayed from the time of discovery up to 24 hours, or up to the limit of the allowed 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 OPERABILITY requirements for the LCO must immediately be declared not met, and the applicable conditions(s) must be entered.

   When the surveillance is performed within the delay period and the surveillance is not met, the OPERABILITY requirements for the LCO must immediately be declared not met, and the applicable conditions(s) must be entered.

d. Entry into an operational MODE or other specified condition shall not be made unless the surveillance requirement(s) associated with a LIMITING CONDITION FOR OPERATION have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to operational MODES as required to comply with action requirements.

   Exceptions to these requirements are stated in the individual Technical Specifications.

BASIS - Surveillance Requirements (TS 4.0)

TS 4 0 a establishes the requirements that surveillances must be met during the operational MODES or other conditions for which the requirements of the LIMITING CONDITIONS FOR OPERATION (LCO) apply unless otherwise stated in an individual surveillance requirement. The purpose of this TS is to ensure that surveillances are performed to verify the OPERABILITY of systems and components and that parameters are within specified limits This ensures safe operation of the facility when the plant is in a MODE or other specified condition for which the associated LCOs are applicable. Surveillance requirements do not have to be performed when the facility is in an operational MODE for which the requirements of the associated LCO do not apply unless otherwise specified 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.

TS 4 0.b establishes the limit for which the specified time interval for surveillance requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operation 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 TS 4.0.b 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.

TS 4.0.c 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 allowed surveillance interval. A delay period of up to 24 hours or up to the limit of the allowed 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 TS 4.0.b, and not at the time that the allowed 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 required actions or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements. When a surveillance with an allowed interval based not on time intervals, but upon specified unit conditions, OPERATING situations, or requirements of regulations (e.g., prior to entering OPERATING MODE 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, TS 4 0 c allows for the full delay period of up to the allowed 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.

TS 4.0.c 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 allowed surveillance intervals for SRs is expected to be an infrequent occurrence. Use of the delay period established by TS 4.0.c is 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 allowed 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 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 applicable LCO conditions begin immediately upon 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 TS 4.0.a.

TS 4.0.d establishes the requirements that all applicable surveillance must be met before entry into an operational MODE or other condition of operation specified in the applicability statement. The purpose of the TS is to ensure that system and component operability requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in operational MODES or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of the TS, the applicable surveillance requirements must be performed within the specified surveillance interval to ensure that the LCOs are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with action requirements, the provisions of TS 4 0.d do not apply because this would delay placing the facility in a lower MODE of operation.

6.21 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

The Bases Control Program shall be established, implemented and maintained. 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. Changes to bases may be made without prior NRC approval provided the changes do not require either of the following:

   1. A change in the TS incorporated in the license.

   2. A change to the USAR or bases that requires NRC approval pursuant to 10 CFR 50.59.

c. Proposed changes that meet the criteria of 6.21.b.1 and 6.21.b.2 above shall be reviewed and approved by the NRC prior to implementation.

d. The Bases Control Program shall contain provisions to ensure that the bases are maintained consistent with the USAR.

e. Changes to the bases implemented without prior NRC approval shall be provided to the NRC on a frequency not to exceed that of 10 CFR 50.71(e).