



James Scarola  
Vice President  
Harris Nuclear Plant

SERIAL: HNP-02-126  
10 CFR 50.90

SEP 26 2002

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

SHEARON HARRIS NUCLEAR POWER PLANT, UNIT NO. 1  
DOCKET NO. 50-400/LICENSE NO. NPF-63  
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE REGARDING MISSED  
SURVEILLANCE AND ADOPTION OF A TECHNICAL SPECIFICATION BASES  
CONTROL PROGRAM USING THE CONSOLIDATED LINE ITEM IMPROVEMENT  
PROCESS

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Carolina Power & Light Company (CP&L) is submitting a request for an amendment to the Technical Specifications (TS) for the Harris Nuclear Plant (HNP). The proposed amendment would modify the TS requirements for missed surveillances in Surveillance Requirement (SR) 4.0.3 and add a TS requirement for a TS Bases control program in Administrative Controls Section 6.16.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides the revised TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked up to show the proposed change (for information only).

In accordance with 10 CFR 50.91(b), CP&L is providing the State of North Carolina a copy of the proposed license amendment.

CP&L requests approval of the proposed License Amendment by March 27, 2003, with the amendment being implemented within 90 days of issuance of the amendment.

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New Hill, NC 27562

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A001

Please refer any questions regarding this submittal to Mr. John Caves at (919) 362-3137.

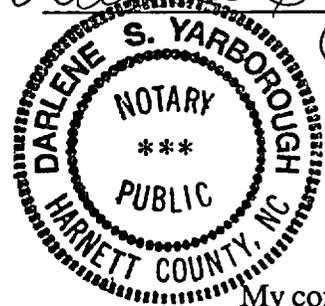
Sincerely,



JS/jpy

- Attachments:
1. Description and Assessment
  2. Proposed Technical Specification Changes
  3. Revised Technical Specification Pages
  4. Regulatory Commitments
  5. Proposed Technical Specification Bases Changes

James Scarola, having been first duly sworn, did depose and say that the information contained herein is true and correct to the best of his information, knowledge and belief, and the sources of his information are employees, contractors, and agents of Carolina Power & Light Company.

Notary (Seal)

My commission expires:

2-21-2005

- c:
- Mr. J. B. Brady, NRC Sr. Resident Inspector
  - Ms. Beverly O. Hall, N.C. DEHNR
  - Mr. R. Subbaratnam, NRC Project Manager
  - Mr. L. A. Reyes, NRC Regional Administrator

ATTACHMENT 1 TO SERIAL: HNP-02-126

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DESCRIPTION AND ASSESSMENT

DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) requirements for missed surveillances in Surveillance Requirement (SR) 4.0.3 and add a TS requirement for a TS Bases control program in Administrative Controls Section 6.16.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change, TSTF-358 Revision 5, as modified by Federal Register Notice 66FR32400, of June 14, 2001, and in response to public comments. The availability of this TS improvement was published in the *Federal Register* on September 28, 2001, as part of the consolidated line item improvement process (CLIP).

ASSESSMENT

Applicability of Published Safety Evaluation

Carolina Power & Light (CP&L) Company has reviewed the 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 information provided to support TSTF-358. CP&L has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Harris Nuclear Plant (HNP) and justify this amendment for the incorporation of the change to the HNP TS.

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### Optional Changes and Variations

CP&L is not proposing any variations or deviations from the TS changes described in the fully modified TSTF-358 Revision 5 or the NRC staff's model safety evaluation dated June 14, 2001.

The existing HNP TS do not include an administrative requirement for a TS Bases control program. CP&L has included an administrative requirement for a TS Bases control program as part of the proposed TS amendment to comply with the Notice of Availability published in the *Federal Register* on September 28, 2001.

### REGULATORY ANALYSIS

#### No Significant Hazards Consideration Determination

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

CP&L has also evaluated if a significant hazards consideration is involved with the proposed TS change to incorporate an administrative requirement for a TS Bases control program. The proposed change does not involve a significant hazards consideration as determined by the following 10 CFR 50.92 evaluation:

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

The proposed change to provide a TS Bases control program presents more stringent requirements than previously existed in TS. This change does not result in operation that will increase the probability of initiating an analyzed event. Plant structures, systems, and components will not be operated in a different manner as a result of these proposed changes, and no physical modifications to equipment are involved. These changes do not alter the assumptions for mitigation of an accident or transient event. The more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, the changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change to provide a TS Bases control program presents more stringent requirements than previously existed in TS. This change does not result in operation that will create the possibility of initiating a new or different kind of event. Plant structures, systems, and components will not be operated in a different manner as a result of these proposed changes, and no physical modifications to equipment are involved. The more restrictive requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, this change does not create the possibility of a new or different type of accident from any previously evaluated.

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

The proposed change to provide a TS Bases control program presents more stringent requirements than previously existed in TS. This change does not result in a decrease in the margin of safety. Plant structures, systems, and components will not be operated in a different manner as a result of these proposed changes, and no physical modifications to equipment are involved. The more restrictive requirements provide additional controls to enhance plant safety. This change maintains requirements consistent with the safety analyses and licensing basis. Therefore, this change does not involve a significant reduction in the margin of safety.

#### Verifications and Commitments

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

CP&L will establish TS Bases for SR 4.0.3 which state that use of the delay period established by SR 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals, but only for the performance of missed surveillances.

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The modification will also include changes to the Bases for SR 4.0.3 that provide details on how to implement the new requirements. The Bases changes provide guidance for surveillance frequencies that are not based on time intervals but are based on specified unit conditions, operating situations, or requirements of regulations. In addition, the Bases changes state that CP&L is expected to perform a missed surveillance at the first reasonable opportunity, taking into account appropriate considerations, such as the impact on plant risk and accident analysis assumptions, consideration of unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The Bases also state that the risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risks Before Maintenance Activities at Nuclear Power Plants," and that the missed surveillance should be treated as an emergent condition, as discussed in Regulatory Guide 1.182. In addition, the Bases state that the degree of depth and rigor of the evaluation should be commensurate with the importance of the component and that missed surveillances for important components should be analyzed quantitatively. The Bases will also state that the results of the risk evaluation determine the safest course of action. In addition, the Bases state that all missed surveillances will be placed in the licensee's Corrective Action Program. Finally, CP&L has added a TS Bases control program consistent with Section 5.5 of the Improved Standard Technical Specifications.

### ENVIRONMENTAL EVALUATION

CP&L has reviewed the environmental evaluation included in the model safety evaluation dated June 14, 2001, as part of the CLIP. CP&L has concluded that the staff's findings presented in that evaluation are applicable to HNP, and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2 TO SERIAL: HNP-02-126

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PROPOSED TECHNICAL SPECIFICATION CHANGES

## 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% of the specified surveillance interval.

4.0.3 If it is discovered that a surveillance was not performed within its specified surveillance interval, 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 surveillance interval, whichever is ~~less~~. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance Requirements do not have to be performed on inoperable equipment.

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

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

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

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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ADMINISTRATIVE CONTROLS

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<u>6.16 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM</u> . . .	6-28

ADMINISTRATIVE CONTROLS

OFFSITE DOSE CALCULATION MANUAL (Continued)

- 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by the PNSC and the approval of the Plant General Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.
- 6.15 Specification 6.15 has been deleted from Technical Specifications and has been relocated to the ODCM and PCP, as appropriate.

INSERT 3

delete

Page 6-29 has been deleted.

## INSERT 3

### 6.16 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 the 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 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. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

**ATTACHMENT 3 TO SERIAL: HNP-02-126**

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**REVISED TECHNICAL SPECIFICATION CHANGES**

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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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% of the specified surveillance interval.

4.0.3 If it is discovered that a surveillance was not performed within its specified surveillance interval, 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 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 LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the LCO must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance Requirements do not have to be performed on inoperable equipment.

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

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- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

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ADMINISTRATIVE CONTROLS

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## ADMINISTRATIVE CONTROLS

### OFFSITE DOSE CALCULATION MANUAL (Continued)

- 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
  - b. Shall become effective after review and acceptance by the PNSC and the approval of the Plant General Manager.
  - c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.
- 6.15 Specification 6.15 has been deleted from Technical Specifications and has been relocated to the ODCM and PCP, as appropriate.

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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 the 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 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. 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).

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**ATTACHMENT 4 TO SERIAL: HNP-02-126**

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**REGULATORY COMMITMENTS**

The following table identifies those actions committed to by Carolina Power & Light (CP&L) Company in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding this commitment to Mr. John Caves, Supervisor – Licensing/Regulatory Programs at HNP, (919) 362-3137.

<b>Regulatory commitment</b>	<b>Due date/event</b>
CP&L will adopt these Technical Specification (TS) Bases changes for Surveillance Requirement (SR) 4.0.3 upon implementation of the license amendment.	Implemented with amendment.

**ATTACHMENT 5 TO SERIAL: HNP-02-126**

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**PROPOSED CHANGES TO TECHNICAL SPECIFICATION BASES PAGES**

## APPLICABILITY

### BASES

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4.0.1 This specification provides that surveillance activities necessary to ensure 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.

4.0.2 The provisions of this specification establish 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 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. Likewise, it is not the intent that the 18-month interval surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of Specification 4.0.2 is based on engineering 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 Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is ~~less~~ <sup>greater</sup>, 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 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 interval based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, Specification 4.0.3 allows the full delay period of 24 hours to perform the surveillance.~~ <sup>Insert 1</sup>

## BASES INSERTS

### Insert 1

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

SR 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.

### Insert 2

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.

## APPLICABILITY

### BASES

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#### 4.0.3 (Continued)

~~Specification 4.0.3 also provides a time limit for completion of surveillances that become applicable as a consequence of MODE changes imposed by ACTION requirements.~~

Failure to comply with specified surveillance intervals for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals.

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 time limits of the ACTION requirements for the applicable LCO 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 time limits of the ACTION requirements for the applicable LCO begin immediately upon the failure of the surveillance.

Completion of the surveillance within the delay period allowed by this Specification, or within the completion time of the ACTIONS, restores compliance with Specification 4.0.1.

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

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

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