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October 8, 2002  
LIC-02-0111

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

- References:
1. Docket No. 50-285
  2. Letter from OPPD (R. T. Ridenoure) to NRC (Document Control Desk), Fort Calhoun Station Unit No. 1 License Amendment Request, "Technical Specification Change Regarding Missed Surveillances and Adoption of a Technical Specification Bases Control Program", dated July 22, 2002 (LIC-02-0066)
  3. Improved Standard Technical Specification (ITS) for Combustion Engineering Plants, NUREG-1432, Revision 2
  4. Technical Specification Task Force Change Traveler TSTF-358, Revision 6
  5. Federal Register Notice dated September 28, 2001, Notice of Availability of Model Application Concerning Technical Specification Improvement to Modify Requirements Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process, Volume 66, No. 189

**SUBJECT: Fort Calhoun Station Unit No. 1 License Amendment Request, "Technical Specification Change Regarding Missed Surveillances and Adoption of a Technical Specification Bases Control Program" - Supplement**

Pursuant to 10 CFR 50.90, Omaha Public Power District (OPPD) hereby requests the following amendment to the Fort Calhoun Station Unit No. 1 (FCS) Technical Specifications (TS). The proposed amendment deletes TS requirements for missed Surveillances from TS 3.0.4 and adds TS 3.0.5 for missed Surveillances consistent with References 3 and 4. This proposed amendment also adds a TS requirement for a Bases Control Program consistent with that presented in Section 5.5 of Reference 3 per the guidance of Reference 5. The changes requested in this letter supplement the application submitted in Reference 2.

This submittal revises Specification 3.0.4 for consistency with Reference 3, adding the following words to Specification 3.0.4:

"Surveillance Requirements shall be met during the MODES or other specified conditions in the individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 OPERABILITY requirements for the corresponding Limiting Condition for Operation."

Additionally, the words, "...except as provided in Specification 3.0.5," are being added to the end of the first sentence of Specification 3.0.4.

The Bases for Specification 3.0.4 are being augmented for consistency with those of Reference 3 with the exception that Reference 3 Bases information concerning post maintenance testing is not being added to the FCS Bases for Specification 3.0.4. Requirements for post maintenance testing in the FCS TS are addressed in the individual TSs (e.g., TS 3.9).

Attachment 1 contains replacement pages for the marked-up Technical Specification and Bases changes requested in Reference 2. Attachment 2 contains replacement pages for the clean-typed version reflecting the requested Technical Specification and Bases changes. Only the affected Specification 3.0 pages have been included.

The changes discussed above are administrative in nature, therefore the basis and conclusions reached in the Discussion, Justification and No significant Hazards Consideration provided in the July 22, 2002 submittal (Reference 2) remain valid and therefore are not resubmitted.

OPPD requests approval of the proposed amendment by January 15, 2003. OPPD requests 120 days to implement this amendment. No commitments are made to the NRC in this letter.

I declare under penalty of perjury that the foregoing is true and correct. (Executed on October 8, 2002).

If you have any questions or require additional information, please contact Dr. R. L. Jaworski at (402) 533-6833.

Sincerely,



D. J. Bannister  
Manager Fort Calhoun Station

DJB/TRB/trb

Attachments:

1. Replacement pages for the Markup of Technical Specification Pages
2. Replacement pages for the Clean-Typed Technical Specification Pages

c: E. W. Merschoff, NRC Regional Administrator, Region IV  
A. B. Wang, NRC Project Manager  
J. G. Kramer, NRC Senior Resident Inspector  
Division Administrator - Public Health Assurance, State of Nebraska  
Winston & Strawn

# ATTACHMENT 1

Replacement pages for the  
Markup of  
Technical Specification Pages

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

3.0.1 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.

3.0.2 The surveillance intervals are defined as follows:

<u>Notation</u>	<u>Title</u>	<u>Frequency</u>
S	Shift	At least once per 8 hours
D	Daily	At least once per 24 hours
W	Weekly	At least once per 7 days
BW	Biweekly	At least once per 14 days
M	Monthly	At least once per 31 days
Q	Quarterly	At least once per 92 days
SA	Semiannual	At least once per 184 days
A	Annually	At least once per 366 days
R	Refueling	At least once per 18 months
P	Start up	Prior to Reactor Start up, if not completed in the previous week.

Exception to these intervals are stated in the individual Specifications.

3.0.3 The provisions of Specifications 3.0.1 and 3.0.2 are applicable to all codes and standards referenced within the Technical Specifications. The requirements of the Technical Specifications shall have precedence over the requirements of the codes and standards referenced within the Technical Specifications.

3.0.4 *Surveillance Requirements shall be met during the MODES or other specified conditions in the individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 OPERABILITY requirements for the corresponding Limiting Condition for Operation. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specifications 3.0.1 and 3.0.2, shall constitute noncompliance with the OPERABILITY requirements for the corresponding Limiting Condition for Operation except as provided in Specification 3.0.5. 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.*

3.0.5 *If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the OPERABILITY requirements for 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 OPERABILITY requirements for 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 OPERABILITY requirements for the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.*

3-0a

Amendment No. ~~422,429,157~~

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### **BASIS**

Specifications 3.0.1 through 3.0.5-4 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting condition of operation will be met."

Specification 3.0.1 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are 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 surveillance that are not performed during refueling outages. The limitation of Specification 3.0.1 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.

The provisions of Specification 3.0.2 define the surveillance intervals for use in the Technical Specifications. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications. A few surveillance requirements have uncommon intervals. In such a case the surveillance interval shall be performed as defined by the individual specifications.

Specification 3.0.3 extends the testing interval required by codes and standards referenced by the Technical Specifications. This clarification is provided to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities. Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the codes and standards referenced therein. The requirements of regulations take precedence over the TS. Therefore test intervals governed by regulation cannot be extended by the TS. An example of this exception is the Containment Leakage Rate Testing Program.

~~Specification 3.0.4 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, as defined by the provisions of Specifications 3.0.1 and 3.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for the corresponding Limiting Condition for Operation. Under the provisions~~

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### **BASIS (continued)**

~~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 even though the Surveillance Requirements are met. 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 allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 3.0.4. 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 of 3.0.1, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification of 3.0.1 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.~~

~~If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with the ACTION requirements, e.g., Specification 2.0.1, a 24 hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. If a surveillance is not completed within the 24 hour allowance, the time limits of the ACTION requirements are applicable at this 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 must be met to demonstrate that inoperable equipment has been restored to operable status.~~

**Specification 3.0.4 establishes the requirement that Surveillances must be met during the MODES or other specified conditions in the Specification for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillances. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified surveillance interval, in accordance with Specifications 3.0.1 and 3.0.2, constitutes a failure to meet the OPERABILITY requirements for the corresponding Limiting Condition for Operation.**

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

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

**Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated Limiting Condition for Operation are not applicable, unless otherwise specified. The Surveillances associated with a special test exception (STE) are only applicable when the STE is used as an allowable exception to the requirements of a Specification.**

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

**Surveillances, including Surveillances invoked by ACTIONS, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specifications 3.0.1 and 3.0.2, prior to returning equipment to OPERABLE status.**

**Specification 3.0.5 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 3.0.1, 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 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 a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 3.0.5 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 3.0.5 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by ACTIONS.*

*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 3.0.5 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 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 allowable outage time limits of the ACTIONS for the applicable Limiting Condition for Operation 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 allowable outage time limits of the ACTIONS for the applicable Limiting Condition for Operation begin immediately upon the failure of the Surveillance.*

*Completion of the Surveillance within the delay period allowed by this Specification, or within the allowable outage time limits-of the ACTIONS, restores compliance with Specification 3.0.4.*

# ATTACHMENT 2

Replacement pages for the  
Clean-Typed  
Technical Specification Pages

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

3.0.1 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.

3.0.2 The surveillance intervals are defined as follows:

<u>Notation</u>	<u>Title</u>	<u>Frequency</u>
S	Shift	At least once per 8 hours
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A	Annually	At least once per 366 days
R	Refueling	At least once per 18 months
P	Start up	Prior to Reactor Start up, if not completed in the previous week.

Exception to these intervals are stated in the individual Specifications.

3.0.3 The provisions of Specifications 3.0.1 and 3.0.2 are applicable to all codes and standards referenced within the Technical Specifications. The requirements of the Technical Specifications shall have precedence over the requirements of the codes and standards referenced within the Technical Specifications.

3.0.4 Surveillance Requirements shall be met during the MODES or other specified conditions in the individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. 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 OPERABILITY requirements for the corresponding Limiting Condition for Operation. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specifications 3.0.1 and 3.0.2, shall constitute noncompliance with the OPERABILITY requirements for the corresponding Limiting Condition for Operation except as provided in Specification 3.0.5. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. Surveillance Requirements do not have to be performed on inoperable equipment.

3.0.5 If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the OPERABILITY requirements for 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

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### 3.0.5 (continued)

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 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 OPERABILITY requirements for the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION(S) must be entered.

#### **BASIS**

Specifications 3.0.1 through 3.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting condition of operation will be met."

Specification 3.0.1 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are 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 surveillance that are not performed during refueling outages. The limitation of Specification 3.0.1 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.

The provisions of Specification 3.0.2 define the surveillance intervals for use in the Technical Specifications. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications. A few surveillance requirements have uncommon intervals. In such a case the surveillance interval shall be performed as defined by the individual specifications.

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### **BASIS (continued)**

Specification 3.0.3 extends the testing interval required by codes and standards referenced by the Technical Specifications. This clarification is provided to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities. Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the codes and standards referenced therein. The requirements of regulations take precedence over the TS. Therefore test intervals governed by regulation cannot be extended by the TS. An example of this exception is the Containment Leakage Rate Testing Program.

Specification 3.0.4 establishes the requirement that Surveillances must be met during the MODES or other specified conditions in the Specification for which the requirements of the Limiting Condition for Operation apply, unless otherwise specified in the individual Surveillances. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified surveillance interval, in accordance with Specifications 3.0.1 and 3.0.2, constitutes a failure to meet the OPERABILITY requirements for the corresponding Limiting Condition for Operation.

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

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

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

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

Surveillances, including Surveillances invoked by ACTIONS, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specifications 3.0.1 and 3.0.2, prior to returning equipment to OPERABLE status.

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### **BASIS (continued)**

Specification 3.0.5 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified surveillance interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 3.0.1, 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 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 a surveillance interval based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Specification 3.0.5 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 3.0.5 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by ACTIONS.

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 3.0.5 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

## TECHNICAL SPECIFICATIONS

### 3.0 SURVEILLANCE REQUIREMENTS

#### **BASIS (continued)**

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 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 allowable outage time limits of the ACTIONS for the applicable Limiting Condition for Operation 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 allowable outage time limits of the ACTIONS for the applicable Limiting Condition for Operation begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the allowable outage time limits-of the ACTIONS, restores compliance with Specification 3.0.4.