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W3F1-2002-0102

December 19, 2002

**Ken Peters**  
Director, Nuclear Safety Assurance  
Waterford 3

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

**SUBJECT:** Waterford Steam Electric Station, Unit 3 (Waterford 3)  
Docket No. 50-382  
Supplement to License Amendment Request NPF-38-242  
Technical Specification Change Regarding Missed Surveillances Using  
the Consolidated Line Item Improvement Process

**REFERENCES:**

1. TSTF-358, Revision 5 as fully modified by Federal Register  
Notice 66FR32400, dated June 14, 2001
2. Letter dated August 19, 2002, License Amendment Request NPF-  
38-242, Application for Technical Specification Change Regarding  
Missed Surveillances Using the Consolidated Line Item  
Improvement Process (W3F1-2002-0073)

Dear Sir or Madam:

By letter (Reference 2), Entergy Operations, Inc. (Entergy) proposed a change to the Waterford Steam Electric Station, Unit 3 (Waterford 3) Technical Specifications (TSs) to incorporate TSTF-358 (Reference 1), Technical Specification Change Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process.

The standard format of NUREG 1432, Rev. 2 Surveillance Requirement (SR) 3.0.1 is proposed for adoption into the Waterford 3 TS 4.0.1 equivalent. The purpose of this adoption is in support of an NRC request made in a telephone conversation on November 8, 2002. Although the model application and NRC Safety Evaluation (SE) supporting approval of TSTF-358 did not require non-standard TS plants to adopt this change in conjunction with TSTF-358, the SE did contain the same clarifications found in the standard SR 3.0.1 wording. Entergy agrees that adoption of SR 3.0.1 (Waterford 3 TS 4.0.1) would provide added clarification relevant to the application of SR 3.0.3 as modified by TSTF-358, and therefore, proposes to incorporate this change. Because the adoption of the standard wording of NUREG 1432, Rev. 2 into Waterford 3 TS 4.0.1 does not change current regulation or practice and the intent of the specification was discussed in the NRC approval of TSTF-358, the original No Significance Hazards Consideration (NSHC) is not impacted by this change. The proposed change contains only minor variations or deviations from the wording of NUREG 1432, Rev. 2, in order to ensure clarity in light of the current (non-standard) Waterford 3 TS format. The font and other page formatting options are converted to mimic the standard format as closely as possible. The variations are limited to the following:

A001

- The acronym "SR" used in standard SR 3.0.1 and SR 3.0.1 Bases is replaced with "Surveillance" or "Surveillance Requirement" as appropriate in the Waterford 3 TSs and Bases. This is an administrative change only to support Waterford 3 TS accepted wording.
- The term "Frequency" in standard SR 3.0.1 and SR 3.0.1 Bases is changed to "interval" to be consistent with the Waterford 3 TSs and Bases. This is an administrative change only and does not change the meaning or intent of the specification.
- Reference to SR 3.0.2 or SR 3.0.3 in the standard SR 3.0.1 or SR 3.0.1 Bases is changed to the Waterford 3 equivalent of 4.0.2 or 4.0.3, respectively. This is an administrative change only.
- The phrase "Required Actions" or "ACTIONS" found in the standard SR 3.0.1 Bases is replaced with the phrase "LCO Action Statements" or "Action Statements" in the Waterford 3 TS 4.0.1 Bases to be consistent with Waterford 3 TS terminology. This is an administrative change only.
- Reference to an "Auxiliary" feedwater pump and the acronym "AFW" in the standard SR 3.0.1 Bases is replaced with Waterford 3 system terminology of "Emergency" feedwater pump and the corresponding acronym "EFW." This is an administrative change only.
- The example of testing an AFW pump at steam generator pressure of > 800 psi in the standard SR 3.0.1 Bases is changed to > 750 psig in the Waterford 3 4.0.1 Bases to be consistent with Waterford 3 EFW Surveillance Requirement 4.7.1.2b. This is an administrative change only and does not change the intent of the respective Bases.

The last sentence of the current TS 4.0.3 is also deleted because it is redundant to a sentence added to TS 4.0.1 during the above incorporation of standard TS wording. Additionally, the addition of the revised 4.0.1 wording necessitated that the portion of 4.0.5 on page 3/4 0-2 be moved to the top of page 3/4 0-3. Markups of the affected TS pages are included in Attachment 1 and revised TS pages are included in Attachment 2. Markups of the affected TS Bases pages are provided in Attachment 3 for information only.

During the November 8, 2002 call, the NRC noted that Entergy had not included a Bases Control Program in the submittal (Reference 2) for Waterford 3. A Bases Control Program was not included in the submittal because Entergy previously implemented a Bases Control Program, consistent with NUREG 1432, at Waterford 3 in Amendment 161. The NRC approved Amendment 161 on May 9, 2000.


Finally, the original submittal (Reference 2) contained a commitment that read, "The modification will also include changes to the Bases for Specification 4.0.3 that provide details on how to implement the new requirements. This commitment is being revised to read, "The modification will also include changes to the Bases for Specifications 4.0.1 and 4.0.3 that provide details on how to implement the new requirements." This revised commitment is identified in Attachment 4.

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December 19, 2002

If you have any questions or require additional information, please contact D. Bryan Miller at 504-739-6692.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2002.

Sincerely,



K.J. Peters  
Director, Nuclear Safety Assurance

KJP/DBM/cbh

Attachments:

1. Proposed Technical Specification Changes (Mark-up)
2. Proposed Technical Specification Pages
3. Changes to Technical Specification Bases Pages (Mark-up for Information Only)
4. List of Regulatory Commitments

cc: E.W. Merschoff, NRC Region IV  
N. Kalyanam, NRC-NRR  
J. Smith  
N.S. Reynolds  
NRC Resident Inspectors Office  
Louisiana DEQ/Surveillance Division  
American Nuclear Insurers

**Attachment 1**

**W3F1-2002-0102**

**Proposed Technical Specification Changes (Mark-up)**

**APPLICABILITY**

**SURVEILLANCE REQUIREMENTS**

*TS INSERT 4.0.1*

~~4.0.1 Surveillance Requirements shall be applicable 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 twenty-five percent of the specified surveillance interval. *TS INSERT 4.0.3*

~~4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute a failure to meet 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 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 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 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

*△ Move to top of page 3/4 0-3*

**TS INSERT 4.0.1**

Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the Surveillance. 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 interval shall be failure to meet the LCO except as provided in 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

**TS INSERT 4.0.3**

If it is discovered that a Surveillance was not performed within its specified 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(s) must be entered.

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

**Attachment 2**

**W3F1-2002-0102**

**Proposed Technical Specification Pages**

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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**4.0.1** Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the Surveillance. 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 interval shall be failure to meet the LCO except as provided in 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 twenty-five percent of the specified surveillance interval.

**4.0.3** If it is discovered that a Surveillance was not performed within its specified 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(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO 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 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.



**APPLICABILITY**

**SURVEILLANCE REQUIREMENTS (Continued)**

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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 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 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

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

**Required frequencies  
for performing inservice  
inspection and testing  
activities**

Weekly  
Monthly  
Quarterly or every 3 months  
Semiannually or every 6 months  
Yearly or annually

At least once per 7 days  
At least once per 31 days  
At least once per 92 days  
At least once per 184 days  
At least once per 365 days

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



BASES

BASES INSERT 4.0.1

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 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 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.

This extension allowed by Specification 4.0.2 is also applicable to Surveillance Requirements required in Technical specification Actions. However, the extension does not apply to the initial performance. The extension only applies to each performance after the initial performance. The initial performance required by the 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 extension to this completion time is that such an action usually verifies that no loss of function has occurred or accomplishes the function of the inoperable equipment in an alternative manner.

BASES

BASES INSERT 4.0.3

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when 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 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. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(1)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limit of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before 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.

**BASES**

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

Specification 4.0.4 establishes the requirement that all applicable surveillance 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 Condition for Operation are met during initial plant startup or following a plant outage.

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

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

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

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

#### **BASES INSERT 4.0.1**

**Specification 4.0.1** establishes the requirement that Surveillances must be performed during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual Surveillance Requirements. 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 interval, in accordance with 4.0.2, constitutes a failure to meet an LCO.

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 either:

- 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 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 LCO are not applicable, unless otherwise specified. The Surveillance Requirements 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 LCO Action Statements do not have to be performed on inoperable equipment because the Action Statements define the remedial measures that apply. Surveillances have to be met and performed in accordance with 4.0.2, prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with 4.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

Some examples of this process are:

- a. Emergency feedwater (EFW) pump turbine maintenance during refueling that requires testing at steam pressures > 750 psig. However, if other appropriate testing is satisfactorily completed, the EFW System can be considered OPERABLE. This allows

startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

- b. High pressure safety injection (HPSI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPSI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

#### **BASES INSERT 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 its specified interval. A delay period of up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified interval was not met.

This delay period provides an 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 interval based not on time intervals, but upon specified unit conditions, operational 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 interval to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity. Specification 4.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by required actions.

Failure to comply with specified 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. While up to 24 hours or the limit of the specified 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 allowed outage times of the required actions 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 allowed outage times of the required actions for the applicable LCO begin immediately upon the failure of the Surveillance.

Satisfactory 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 4.0.1.



**Attachment 4**

**W3F1-2002-0102**

**List of Regulatory Commitments**

**List of Regulatory Commitments**

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
The modification will also include changes to the Bases for Specifications 4.0.1 and 4.0.3 that provide details on how to implement the new requirements.	X		Implementation