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FERMI 2 TECHNICAL REQUIREMENTS MANUAL – VOL I
Revision 63 dated 3/25/03

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Fermi 2

Technical Requirements Manual

Volume I

Detroit
Edison

<i>ARMS - INFORMATION</i>			
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TR 3.0 LIMITING CONDITION FOR OPERATION (TRLCO) APPLICABILITY

TRLCO 3.0.1 TRLCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in TRLCO 3.0.2 and TRLCO 3.0.5.

TRLCO 3.0.2 Upon discovery of a failure to meet a TRLCO, the Required Actions of the associated Conditions shall be met, except as provided in TRLCO 3.0.5.

If the TRLCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

TRLCO 3.0.3 Noncompliance with a Technical Requirement shall exist when the TRLCO and associated ACTION statement(s) are not met within the specified time intervals.

Once a degraded or nonconforming condition of specific SSCs is identified, an operability determination should be made as soon as possible consistent with the safety importance of the SSC affected. In most cases, it is expected that the decision can be made immediately (e.g., loss of motive power, etc.). In other cases it is expected the decision can be made within approximately 24 hours of discovery even though complete information may not be available. Some few exceptional cases may take longer. Engineering judgement must be used to determine safety significance. The decision should be based on the best information available and must be predicated on the licensee's reasonable expectation that the SSC is operable and that the prompt determination process will support that expectation. When reasonable expectation does not exist, the SSC should be declared inoperable and the safe course of action should be taken.

Conditions of noncompliance are to be documented and evaluated via the corrective action program to determine operability status. If the TRLCO is restored prior to expiration of the specified time intervals, completion of the ACTION statement(s) is not required.

(continued)

TR 3.0 TRLCO APPLICABILITY (continued)

TRLCO 3.0.4 When a TRLCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications.

TRLCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

TRCLO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to TRLCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

TR B3.0 LIMITING CONDITION FOR OPERATION (TRLCO) APPLICABILITY

BASES

TRLCOs TRLCO 3.0.1 through TRLCO 3.0.5 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

TRLCO 3.0.1 TRLCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

TRLCO 3.0.2 TRLCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

(continued)

BASES

TRLCO 3.0.2
(continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.10, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time other conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when the time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

TRLCO 3.0.3

TRLCO 3.0.3 establishes that noncompliance with a Technical Requirement exists when the requirements of the TRLCO are not met and the associated ACTION statement(s) have not been implemented within the specified time intervals. The purpose of this Technical Requirement is to clarify that implementation of the ACTION statement(s) within the specified time interval constitutes compliance with a Technical Requirement and completion of the remedial measures of the ACTION statement(s) is not required when compliance with a TRLCO is restored within the time interval specified in the associated ACTION statement(s).

(continued)

BASES

TRLCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

- a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and
- b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. The exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual specifications sufficiently define the remedial measures to be taken. In some cases, these ACTIONS provide a Note that states "While this LCO is not met, entry into a MODE or other specified condition in the Applicability is not permitted, unless required to comply with ACTIONS." This Note is a requirement explicitly precluding entry into a MODE or other specified condition of the Applicability.

(continued)

BASES

TRLCO 3.0.4
(continued)

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

TRLCO 3.05

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

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

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

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

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