



**Constellation
Energy Group**

Nine Mile Point
Nuclear Station

September 3, 2003
NMP2L 2099

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

**SUBJECT: Nine Mile Point Unit 2
 Docket No. 50-410**

**Application for Technical Specification Change Regarding Mode
Change Limitations Using the Consolidated Line Item
Improvement Process**

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Nine Mile Point Nuclear Station, LLC, (NMPNS) is submitting a request for an amendment to the Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. The proposed amendment would modify Technical Specifications (TS) requirements for mode change limitations in Limiting Condition for Operation (LCO) 3.0.4 and Surveillance Requirement (SR) 3.0.4.

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

NMPNS requests approval of the proposed license amendment by January 30, 2004, with an implementation period of sixty days.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated state representative.

A001

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 3, 2003.

Sincerely,



Peter E. Katz
Vice President Nine Mile Point

PEK/JJD/bjh

Attachments:

1. Description and Assessment
2. Proposed Technical Specification Changes (Mark-up)
3. Proposed Technical Specification Bases Changes (Mark-up)
4. List of Regulatory Commitments

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Mr. John P. Spath, NYSERDA

ATTACHMENT 1
Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify the Nine Mile Point Unit 2 (NMP2) Technical Specifications (TSs) requirements for mode change limitations in Limiting Condition for Operation (LCO) 3.0.4 and Surveillance Requirement (SR) 3.0.4. The affected TSs and a summary of proposed changes are included in Table 1.

The changes are consistent with the NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, "Increase Flexibility in MODE Restraints," TSTF-359, Rev. 9, dated April 25, 2003. TSTF-359, Rev. 9 is the equivalent of TSTF-359, Rev. 8, as modified by the notice in the *Federal Register* dated April 4, 2003. That *Federal Register* notice announced the availability of this TS improvement through the consolidated line item improvement process (CLIP).

2.0 ASSESSMENT

2.1 Applicability of the Published Safety Evaluation

Nine Mile Point Nuclear Station, LLC, (NMPNS) has reviewed the safety evaluation included in the *Federal Register* notice on April 4, 2003 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-359, Rev. 9. NMPNS has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to NMP2 and justify this amendment for the incorporation of the changes to the NMP2 TSs.

2.2 Optional Changes and Variations

NMPNS is not proposing any optional changes or deviations from the TS changes described in TSTF-359, Rev. 9 and the NRC staff's model safety evaluation included in the *Federal Register* notice on April 4, 2003.

However, due to minor differences between the NMP2 TSs and the model TSs in NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR/6," Rev. 2, several variances from the TSTF mark-up changes are necessary. These variations are discussed below and do not affect the adoption or application of TSTF-359, Rev. 9.

- A. TSTF-359 deletes the LCO 3.0.4 non-applicability note applying to all actions in Specification 3.4.7, "Reactor Coolant System." In the NMP2 TS, individual LCO

3.0.4 non-applicability notes are contained in the Required Actions for Conditions A and B. These notes are to be deleted.

- B. NMP2 does not have primary containment drywell hydrogen ignitors or a drywell purge system. Therefore, the proposed changes to the Specifications for these systems identified in TSTF-359 are not applicable.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

NMPNS has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* as part of the CLIP. NMPNS has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to NMP2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on April 4, 2003 for this TS improvement, plant-specific verifications were performed as follows:

NMP2 has established TS Bases for LCO 3.0.4 and SR 3.0.4 which state that use of the TS mode change limitation flexibility established by LCO 3.0.4 and SR 3.0.4 is not to 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 TS Applicability.

Changes will be made to the bases for LCO 3.0.4 and SR 3.0.4 upon implementation of the proposed amendment that provide details on how to implement the new requirements. The bases changes provide guidance for changing Modes or other specified conditions in the Applicability when an LCO is not met. The bases changes describe in detail how: LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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; LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; and LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification, which is typically applied to Specifications which describe values and parameters (e.g., Reactor Coolant System Specific Activity), though it may be applied to other Specifications based on NRC plant-specific approval. The bases also state that any 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 results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. In addition, the bases state that upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification. The bases also state that SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

Finally, the NMP2 TSs have a bases control program consistent with Section 5.5 of the Standard Technical Specifications (STS), and the equivalent of STS SR 3.0.1 and associated bases.

4.0 Environmental Evaluation

NMPNS has reviewed the environmental evaluation included in the model safety evaluation dated April 4, 2003 as part of the CLIP. NMPNS has concluded that the staff's findings presented in that evaluation are applicable to NMP2 and the evaluation is hereby incorporated by reference for this application.

TABLE 1**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGES**

Affected TS	Description of Change
LCO 3.0.4	Addition of risk-informed evaluation of Mode changes
SR 3.0.4	Clarification of relationship to SR 3.0.3
3.3.3.1 Post Accident Monitoring Instrumentation	Deletion of Note exempting TS from LCO 3.0.4
3.3.3.2 Remote Shutdown System	Deletion of Note exempting TS from LCO 3.0.4
3.4.7 Reactor Coolant System (RCS) Leakage Detection Instrumentation	Deletion of Note exempting Required Actions A.1, B.1 and B.2 from LCO 3.0.4
3.4.8 RCS Specific Activity	Deletion of Note exempting Required Actions A.1 and A.2 from LCO 3.0.4 Addition of Note stating applicability of LCO 3.0.4.c to Required Actions A.1 and A.2
3.4.9 Residual Heat Removal Shutdown Cooling System - Hot Shutdown	Deletion of Note exempting TS from LCO 3.0.4
3.5.1 Emergency Core Cooling Systems (ECCS) - Operating	Addition of Note stating that LCO 3.0.4.b is not applicable to the High Pressure Core Spray System (HPCS)
3.5.3 Reactor Core Isolation Cooling (RCIC) System	Addition of Note stating that LCO 3.0.4.b is not applicable to RCIC
3.6.3.1 Primary Containment Hydrogen Recombiners	Deletion of Note exempting Required Action A.1 from LCO 3.0.4
3.8.1 AC Sources - Operating	Addition of Note stating that LCO 3.0.4.b is not applicable to diesel generators (DGs)

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO 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.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 2 within 7 hours;
- b. MODE 3 within 13 hours; and
- c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4

Insert | →

~~When an LCO 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.~~

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

Exceptions to this Specification are stated in the individual Specifications.

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

LCO 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 LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not

(continued)

3.0 SR APPLICABILITY (continued)

SR 3.0.4

Insert 2 →

~~Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into 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.~~

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

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.6.	Immediately
C. One or more Functions with two required channels inoperable.	C.1 Restore one required channel to OPERABLE status.	7 days

(continued)

3.3 INSTRUMENTATION

3.3.3.2 Remote Shutdown System

LCO 3.3.3.2 The Remote Shutdown System Functions shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

NOTES

1. LCO 3.0.4 is not applicable.
2. Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required Functions inoperable.	A.1 Restore required Function to OPERABLE status.	30 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

RCS Leakage Detection Instrumentation
3.4.7

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.7 RCS Leakage Detection Instrumentation

LCO 3.4.7 The following RCS leakage detection instrumentation shall be OPERABLE:

- a. Drywell floor drain tank fill rate monitoring system; and
- b. One channel of either drywell atmospheric particulate or atmospheric gaseous monitoring system.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Drywell floor drain tank fill rate monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>A.1 Restore drywell floor drain tank fill rate monitoring system to OPERABLE status.</p>	30 days
B. Required drywell atmospheric monitoring system inoperable.	<p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> <p>B.1 Analyze grab samples of drywell atmosphere.</p> <p><u>AND</u></p> <p>B.2 Restore required drywell atmospheric monitoring system to OPERABLE status.</p>	Once per 12 hours 30 days

(continued)

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.8 RCS Specific Activity

LCO 3.4.8 The specific activity of the reactor coolant shall be limited to DOSE EQUIVALENT I-131 specific activity $\leq 0.2 \mu\text{Ci/gm}$.

APPLICABILITY: MODE 1, MODES 2 and 3 with any main steam line not isolated.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Reactor coolant specific activity $> 0.2 \mu\text{Ci/gm}$ and $\leq 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.</p>	<p style="text-align: center;">----- NOTE ----- LCO 3.0.4 is not applicable.</p>	
	<p>A.1 Determine DOSE EQUIVALENT I-131.</p> <p><u>AND</u></p> <p>A.2 Restore DOSE EQUIVALENT I-131 to within limits.</p>	<p>Once per 4 hours</p> <p>48 hours</p>
<p>B. Required Action and associated Completion Time of Condition A not met.</p> <p><u>OR</u></p> <p>Reactor coolant Specific activity $> 4.0 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131.</p>	<p>B.1 Determine DOSE EQUIVALENT I-131.</p> <p><u>AND</u></p> <p>B.2.1 Isolate all main steam lines.</p> <p><u>OR</u></p>	<p>Once per 4 hours</p> <p>12 hours</p> <p>(continued)</p>

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.1 ECCS—Operating

LCO 3.5.1 Each ECCS injection/spray subsystem and the Automatic Depressurization System (ADS) function of six safety/relief valves shall be OPERABLE.

APPLICABILITY: MODE 1, MODES 2 and 3, except ADS valves are not required to be OPERABLE with reactor steam dome pressure \leq 150 psig.

ACTIONS *Insert 3*

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One low pressure ECCS injection/spray subsystem inoperable.	A.1 Restore low pressure ECCS injection/spray subsystem to OPERABLE status.	7 days
B. High Pressure Core Spray (HPCS) System inoperable.	B.1 Verify by administrative means RCIC System is OPERABLE when RCIC is required to be OPERABLE.	Immediately
	<u>AND</u> B.2 Restore HPCS System to OPERABLE status.	14 days

(continued)

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS) AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.3 RCIC System

LCO 3.5.3 The RCIC System shall be OPERABLE.

APPLICABILITY: MODE 1,
MODES 2 and 3 with reactor steam dome pressure > 150 psig.

ACTIONS ← *Insert 4*

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. RCIC System inoperable.	A.1 Verify by administrative means High Pressure Core Spray System is OPERABLE.	Immediately
	<u>AND</u> A.2 Restore RCIC System to OPERABLE status.	14 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Reduce reactor steam dome pressure to ≤ 150 psig.	36 hours

Primary Containment Hydrogen Recombiners
3.6.3.1

3.6 CONTAINMENT SYSTEMS

3.6.3.1 Primary Containment Hydrogen Recombiners

LCO 3.6.3.1 Two primary containment hydrogen recombiners shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. One primary containment hydrogen recombiner inoperable.</p>	<p>A.1</p> <div style="border: 1px solid black; border-radius: 15px; padding: 5px; margin: 10px 0;"> <p style="text-align: center;">NOTE LCO 3.0.4 is not applicable.</p> </div> <p>Restore primary containment hydrogen recombiner to OPERABLE status.</p>	<p>30 days</p>
<p>B. Two primary containment hydrogen recombiners inoperable.</p>	<p>B.1</p> <p>Verify by administrative means that the hydrogen and oxygen control function is maintained.</p> <p><u>AND</u></p> <p>B.2</p> <p>Restore one primary containment hydrogen recombiner to OPERABLE status.</p>	<p>1 hour</p> <p><u>AND</u></p> <p>Once per 12 hours thereafter</p> <p>7 days</p>

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.1 AC Sources—Operating

LCO 3.8.1 The following AC electrical power sources shall be OPERABLE:

- a. Two qualified circuits between the offsite transmission network and the onsite Class 1E AC Electric Power Distribution System; and
- b. Three diesel generators (DGs).

APPLICABILITY: MODES 1, 2, and 3.

-----NOTE-----
Division 3 AC electrical power sources are not required to be OPERABLE when High Pressure Core Spray (HPCS) System is inoperable.

ACTIONS ← *Insert 5*

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required offsite circuit inoperable.	A.1 Perform SR 3.8.1.1 for OPERABLE required offsite circuit. <u>AND</u>	1 hour <u>AND</u> Once per 8 hours thereafter (continued)

Insert 1 (LCO 3.0.4)

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. 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;**
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or**
- c. When an allowance is stated in the individual value, parameter, or other Specification.**

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.

Insert 2 (SR 3.0.4)

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into 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.

Insert 3 (LCO 3.5.1)

-----**NOTE**-----

LCO 3.0.4.b is not applicable to HPCS.

Insert 4 (LCO 3.5.3)

-----**NOTE**-----

LCO 3.0.4.b is not applicable to RCIC.

Insert 5 (LCO 3.8.1)

-----**NOTE**-----

LCO 3.0.4.b is not applicable to DGs.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION BASES CHANGES (MARK-UP)

The mark-up Bases pages are provided for information only.

BASES

LCO 3.0.3
(continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.6 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.6 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 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.

*Bases
Insert 1* →

(continued)

BASES

LCO 3.0.4
(continued)

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.

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.

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.

LCO 3.0.5

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:

(continued)

BASES

SR 3.0.3
(continued)

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 then is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions 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 SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

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.

*Bases
Insert 2 →*

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1 which states that Surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern

(continued)

BASES

SR 3.0.4
(continued)

any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of SR 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 SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 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, SR 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 SR 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.

BASES

LCO

11. Suppression Pool Water Temperature (continued)

available for the indicator and a different pen recorder for each sensor is available for the two recorders so that each sensor can be monitored. The indicator and recorders are the primary indication used by the operator during an accident. Therefore, the PAM Specification deals specifically with this portion of the instrument channels.

APPLICABILITY

The PAM instrumentation LCO is applicable in MODES 1 and 2. These variables are related to the diagnosis and preplanned actions required to mitigate DBAs. The applicable DBAs are assumed to occur in MODES 1 and 2. In MODES 3, 4, and 5, plant conditions are such that the likelihood of an event that would require PAM instrumentation is extremely low; therefore, PAM instrumentation is not required to be OPERABLE in these MODES.

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

A Note has ~~also~~ been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate inoperable functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

(continued)

BASES

APPLICABILITY
(continued)

necessary instrument control Functions if control room instruments or control becomes unavailable. Consequently, the LCO does not require OPERABILITY in MODES 3, 4, and 5.

ACTIONS

A Note is included that excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into an applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require a plant shutdown. This exception is acceptable due to the low probability of an event requiring this system.

A Note has been provided to modify the ACTIONS related to Remote Shutdown System Functions. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable Remote Shutdown System Functions provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable Remote Shutdown System Function.

A.1

Condition A addresses the situation where one or more required Functions of the Remote Shutdown System is inoperable. This includes any Function listed in Reference 4, as well as the control and transfer switches. The Required Action is to restore the Function (both divisions, if applicable) to OPERABLE status within 30 days. The Completion Time is based on operating experience and the low probability of an event that would require evacuation of the control room.

B.1

If the Required Action and associated Completion Time of Condition A are not met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status,

(continued)

BASES (continued)

LCO The drywell floor drain tank fill rate monitoring system is required to quantify the unidentified LEAKAGE from the RCS. The other monitoring system (particulate or gaseous) provides early alarms to the operators so closer examination of other detection systems will be made to determine the extent of any corrective action that may be required. With the leakage detection systems inoperable, monitoring for LEAKAGE in the RCPB is degraded.

APPLICABILITY In MODES 1, 2, and 3, leakage detection systems are required to be OPERABLE to support LCO 3.4.5. This Applicability is consistent with that for LCO 3.4.5.

ACTIONS

A.1

With the drywell floor drain tank fill rate monitoring system inoperable, no other form of sampling can provide the equivalent information to quantify leakage. However, the drywell atmospheric activity monitor will provide indications of changes in leakage.

With the drywell floor drain tank fill rate monitoring system inoperable, but with RCS unidentified and total LEAKAGE being determined every 12 hours (SR 3.4.5.1), operation may continue for 30 days. The 30 day Completion Time of Required Action A.1 is acceptable, based on operating experience, considering the multiple forms of leakage detection that are still available. Required

Action A.1 is modified by a Note that states that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when the drywell floor drain tank fill rate monitoring system is inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

B.1 and B.2

With both gaseous and particulate drywell atmospheric monitoring channels inoperable (i.e., the required drywell atmospheric monitoring system), grab samples of the drywell atmosphere shall be taken and analyzed to provide periodic leakage information. Provided a sample is obtained and

(continued)

BASES

ACTIONS

B.1 and B.2 (continued)

analyzed every 12 hours, the plant may be operated for up to 30 days to allow restoration of at least one of the required monitors.

The 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The 30 day Completion Time for restoration recognizes that at least one other form of leakage detection is available.

The Required Actions are modified by a Note that states that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when both the gaseous and particulate primary containment atmospheric monitoring channels are inoperable. This allowance is provided because other instrumentation is available to monitor RCS leakage.

C.1 and C.2

If any Required Action and associated Completion Time of Condition A or B cannot be met, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions in an orderly manner and without challenging plant systems.

D.1

With all required monitors inoperable, no required automatic means of monitoring LEAKAGE are available, and immediate plant shutdown in accordance with LCO 3.0.3 is required.

SURVEILLANCE
REQUIREMENTS

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the other required instrumentation (either the drywell floor drain tank fill rate monitoring system or the drywell atmospheric monitoring channel, as applicable) is OPERABLE. Upon completion of the Surveillance, or

(continued)

BASES

APPLICABLE
SAFETY ANALYSES
(continued)

The limit on specific activity is a value from a parametric evaluation of typical site locations. This limit is conservative because the evaluation considered more restrictive parameters than for a specific site, such as the location of the site boundary and the meteorological conditions of the site.

RCS specific activity satisfies Criterion 2 of Reference 3.

LCO

The specific iodine activity is limited to $\leq 0.2 \mu\text{Ci/gm}$ DOSE EQUIVALENT I-131. This limit ensures the source term assumed in the safety analysis for the MSLB is not exceeded, so any release of radioactivity to the environment during an MSLB is less than a small fraction of the 10 CFR 100 limits.

APPLICABILITY

In MODE 1, and MODES 2 and 3 with any main steam line not isolated, limits on the primary coolant radioactivity are applicable since there is an escape path for release of radioactive material from the primary coolant to the environment in the event of an MSLB outside of primary containment.

In MODES 2 and 3 with the main steam lines isolated, such limits do not apply since an escape path does not exist. In MODES 4 and 5, no limits are required since the reactor is not pressurized and the potential for leakage is reduced.

ACTIONS

A.1 and A.2

When the reactor coolant specific activity exceeds the LCO DOSE EQUIVALENT I-131 limit, but is $\leq 4.0 \mu\text{Ci/gm}$, samples must be analyzed for DOSE EQUIVALENT I-131 at least once every 4 hours. In addition, the specific activity must be restored to the LCO limit within 48 hours. The Completion Time of once every 4 hours is based on the time needed to take and analyze a sample. The 48 hour Completion Time to restore the activity level provides a reasonable time for temporary coolant activity increases (iodine spikes or crud bursts) to be cleaned up with the normal processing systems.

*Bases
Insert 3 →*

A Note to the Required Action of Condition A excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE(S) while relying on the

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

allowance

~~ACTIONS even though the ACTIONS may eventually require plant shutdown.~~ This exception is acceptable due to the significant conservatism incorporated into the specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.

B.1, B.2.1, B.2.2.1, and B.2.2.2

If the DOSE EQUIVALENT I-131 cannot be restored to $\leq 0.2 \mu\text{Ci/gm}$ within 48 hours, or if at any time it is $> 4.0 \mu\text{Ci/gm}$, it must be determined at least every 4 hours and all the main steam lines must be isolated within 12 hours. Isolating the main steam lines precludes the possibility of releasing radioactive material to the environment in an amount that is more than a small fraction of the requirements of 10 CFR 100 during a postulated MSLB accident.

Alternately, the plant can be brought to MODE 3 within 12 hours and to MODE 4 within 36 hours. This option is provided for those instances when isolation of main steam lines is not desired (e.g., due to the decay heat loads). In MODE 4, the requirements of the LCO are no longer applicable.

The Completion Time of once every 4 hours is the time needed to take and analyze a sample. The 12 hour Completion Time is reasonable, based on operating experience, to isolate the main steam lines in an orderly manner and without challenging plant systems. Also, the allowed Completion Times for Required Actions B.2.2.1 and B.2.2.2 for bringing the plant to MODES 3 and 4 are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

(continued)

BASES (continued)

ACTIONS

A Note to the ACTIONS excludes the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the ACTIONS even though the ACTIONS may eventually require plant shutdown. This exception is acceptable due to the redundancy of the OPERABLE subsystems, the low pressure at which the plant is operating, the low probability of an event occurring during operation in this condition, and the availability of alternate methods of decay heat removal capability.

A ~~Section~~ Note has been provided to modify the ACTIONS related to RHR shutdown cooling subsystems. Section 1.3, Completion Times, specifies once a Condition has been entered, subsequent divisions, subsystems, components or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable shutdown cooling subsystems provide appropriate compensatory measures for separate inoperable shutdown cooling subsystems. As such, a Note has been provided that allows separate Condition entry for each inoperable RHR shutdown cooling subsystem.

A.1, A.2, and A.3

With one RHR shutdown cooling subsystem inoperable for decay heat removal, except as permitted by LCO Note 2, the inoperable subsystem must be restored to OPERABLE status without delay. In this condition, the remaining OPERABLE subsystem can provide the necessary decay heat removal. The overall reliability is reduced, however, because a single failure in the OPERABLE subsystem could result in reduced RHR shutdown cooling capability. Therefore an alternate method of decay heat removal must be provided.

With both RHR shutdown cooling subsystems inoperable, an alternate method of decay heat removal must be provided in addition to that provided for the initial RHR shutdown cooling subsystem inoperability. This re-establishes backup decay heat removal capabilities, similar to the requirements of the LCO. The 1 hour Completion Time is based on the decay heat removal function and the probability of a loss of the available decay heat removal capabilities.

(continued)

BASES (continued)

ACTIONS

A.1

*Bases
Insert 4*

If any one low pressure ECCS injection/spray subsystem is inoperable, the inoperable subsystem must be restored to OPERABLE status within 7 days. In this condition, the remaining OPERABLE subsystems provide adequate core cooling during a LOCA. However, overall ECCS reliability is reduced because a single failure in one of the remaining OPERABLE subsystems concurrent with a LOCA may result in the ECCS not being able to perform its intended safety function. The 7 day Completion Time is based on a reliability study (Ref. 13) that evaluated the impact on ECCS availability by assuming that various components and subsystems were taken out of service. The results were used to calculate the average availability of ECCS equipment needed to mitigate the consequences of a LOCA as a function of allowed outage times (i.e., Completion Times).

B.1 and B.2

If the HPCS System is inoperable, and the RCIC System is immediately verified to be OPERABLE (when RCIC is required to be OPERABLE), the HPCS System must be restored to OPERABLE status within 14 days. In this condition, adequate core cooling is ensured by the OPERABILITY of the redundant and diverse low pressure ECCS injection/spray subsystems in conjunction with the ADS. Also, the RCIC System will automatically provide makeup water at most reactor operating pressures. Immediate verification of RCIC OPERABILITY is therefore required when HPCS is inoperable and RCIC is required to be OPERABLE. This may be performed by an administrative check, by examining logs or other information, to determine if RCIC is out of service for maintenance or other reasons. It is not necessary to perform the Surveillances needed to demonstrate the OPERABILITY of the RCIC System. However, if the OPERABILITY of the RCIC System cannot be immediately verified and RCIC is required to be OPERABLE, Condition D must be entered. If a single active component fails concurrent with a design basis LOCA, there is a potential, depending on the specific failure, that the minimum required ECCS equipment will not be available. A 14 day Completion Time is based on the results of a reliability study (Ref. 13) and has been found to be acceptable through operating experience.

(continued)

BASES

BACKGROUND
(continued)

The RCIC pump is provided with a minimum flow bypass line, which discharges to the suppression pool. The valve in this line automatically opens to prevent pump damage due to overheating when other discharge line valves are closed. To ensure rapid delivery of water to the RPV and to minimize water hammer effects, the RCIC System discharge line "keep fill" system is designed to maintain the pump discharge line filled with water.

APPLICABLE
SAFETY ANALYSES

The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC System is not an Engineered Safety Feature System and no credit is taken in the safety analyses for RCIC System operation. Based on its contribution to the reduction of overall plant risk, the system satisfies Criterion 4 of Reference 3.

LCO

The OPERABILITY of the RCIC System provides adequate core cooling such that actuation of any of the ECCS subsystems is not required in the event of RPV isolation accompanied by a loss of feedwater flow. The RCIC System has sufficient capacity to maintain RPV inventory during an isolation event.

APPLICABILITY

The RCIC System is required to be OPERABLE in MODE 1, and MODES 2 and 3 with reactor steam dome pressure > 150 psig since RCIC is the primary non-ECCS water source for core cooling when the reactor is isolated and pressurized. In MODES 2 and 3 with reactor steam dome pressure ≤ 150 psig, and in MODES 4 and 5, RCIC is not required to be OPERABLE since the ECCS injection/spray subsystems can provide sufficient flow to the vessel.

ACTIONS

A.1 and A.2

*bases
Insert 5*

If the RCIC System is inoperable during MODE 1, or MODES 2 or 3 with reactor steam dome pressure > 150 psig, and the HPCS System is immediately verified to be OPERABLE, the RCIC System must be restored to OPERABLE status within 14 days.

(continued)

BASES

ACTIONS

A.1 (continued)

accumulation exceeding this limit, and the low probability of failure of the OPERABLE primary containment hydrogen recombiner.

Required Action A.1 has been modified by a Note stating that the provisions of LCO 3.0.4 are not applicable. As a result, a MODE change is allowed when one recombiner is inoperable. This allowance is provided because of the low probability of the occurrence of a LOCA that would generate hydrogen and oxygen in amounts capable of exceeding the flammability limits, the low probability of the failure of the OPERABLE recombiner, and the amount of time available after a postulated LOCA for operator action to prevent exceeding the flammability limits.

B.1 and B.2

With two primary containment hydrogen recombiners inoperable, the ability to perform the hydrogen and oxygen control function via an alternate capability must be verified by administrative means within 1 hour. The alternate hydrogen and oxygen control capability is provided by the Primary Containment Vent, Purge, and Nitrogen System and one RHR drywell spray subsystem. The 1 hour Completion Time allows a reasonable period of time to verify that a loss of hydrogen and oxygen control function does not exist. In addition, the alternate hydrogen and oxygen control system capability must be verified once per 12 hours thereafter to ensure its continued availability. Both the initial verification and all subsequent verifications may be performed as an administrative check by examining logs or other information to determine the availability of the alternate hydrogen and oxygen control system. It does not mean to perform the Surveillances needed to demonstrate OPERABILITY of the alternate hydrogen and oxygen control system. If the ability to perform the hydrogen and oxygen control function is maintained, continued operation is permitted with two hydrogen recombiners inoperable for up to 7 days. Seven days is a reasonable time to allow two hydrogen recombiners to be inoperable because the hydrogen and oxygen control function is maintained and because of the low probability of the occurrence of a LOCA that would generate hydrogen and oxygen in the amounts capable of exceeding the flammability limits.

(continued)

BASES

LCO
(continued)

operating in parallel test mode. Proper sequencing of loads, including tripping of nonessential loads, is a required function for DG OPERABILITY.

The AC sources in one division must be separate and independent (to the extent possible) of the AC sources in the other division(s). For the DGs, the separation and independence are complete. For the offsite AC sources, the separation and independence are to the extent practical.

APPLICABILITY

The AC sources are required to be OPERABLE in MODES 1, 2, and 3 to ensure that:

- a. Acceptable fuel design limits and reactor coolant pressure boundary limits are not exceeded as a result of AOOs or abnormal transients; and
- b. Adequate core cooling is provided and containment OPERABILITY and other vital functions are maintained in the event of a postulated DBA.

A Note has been added taking exception to the Applicability requirements for Division 3 sources, provided the HPCS System is declared inoperable. This exception is intended to allow declaring of the Division 3 inoperable either in lieu of declaring the Division 3 source inoperable, or at any time subsequent to entering ACTIONS for an inoperable Division 3 source. This exception is acceptable since, with the Division 3 inoperable and the associated ACTIONS entered, the Division 3 AC sources provide no additional assurance of meeting the above criteria.

AC power requirements for MODES 4 and 5 and other conditions in which AC sources are required are covered in LCO 3.8.2, "AC Sources—Shutdown."

ACTIONS

A.1

To ensure a highly reliable power source remains, it is necessary to verify the availability of the remaining required offsite circuit on a more frequent basis. Since the Required Action only specifies "perform," a failure of SR 3.8.1.1 acceptance criteria does not result in the Required Action not met. However, if the second required

*Bases
Insert 6*

(continued)

Bases Insert 1 (LCO 3.0.4 Bases)

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. 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.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

Bases Insert 1 (cont.)

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these system and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit 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 and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., RCS Specific Activity), and may be applied to other Specifications based on NRC plant-specific approval.

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.

Bases Insert 1 (cont.)

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. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

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, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on 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.

Bases Insert 2 (SR 3.0.4 Bases)

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to Surveillance not being met in accordance with LCO 3.0.4.

Bases Insert 2 (cont.)

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

Bases Insert 3 (RCS Specific Activity Bases)

A Note permits the use of the provisions of LCO 3.0.4.c. This allowance permits entry into the applicable MODE(S) while relying on the ACTIONS.

Bases Insert 4 (ECCS - Operating Bases)

A Note prohibits the application of LCO 3.0.4.b to an inoperable HPCS subsystem. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable HPCS subsystem and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

Bases Insert 5 (RCIC System Bases)

A Note prohibits the application of LCO 3.0.4.b to an inoperable RCIC system. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable RCIC system and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

Bases Insert 6 (AC Sources – Operating Bases)

A Note prohibits the application of LCO 3.0.4.b to an inoperable DG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable DG and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, should not be applied in this circumstance.

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

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

Regulatory Commitment	Due Date/Event
NMPNS will establish the TS Bases as adopted with the license amendment.	Upon implementation of the amendment.