

Industry/TSTF Standard Technical Specification Change Traveler

Relocates discussion of exceptions from LCO 3.0.4 to the Bases

Priority/Classification 1) Correct Specifications

NUREGs Affected: 1430 1431 1432 1433 1434

Description:

This change removes the additional discussion provided in LCO 3.0.4 with respect to the use of exceptions and provides the necessary discussion in the Bases.

Justification:

This change provides consistency with LCO 3.0.3 by moving the discussion of exceptions from the LCO to the Bases. In addition, this change reduces the potential for confusion by revising the discussion to eliminate the repeated use of the phrase "Modes or other specified conditions in the Applicability" to increase clarity.

Revision History

OG Revision 0

Revision Status: Active

Next Action:

Revision Proposed by: Ginna

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 30-Oct-95

Owners Group Comments
Ginna 3

Owners Group Resolution: **Approved** Date: 09-Nov-96

TSTF Review Information

TSTF Received Date: 27-Nov-95 Date Distributed for Review 27-Nov-95

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

CEOG accepts
BWOG accepts
BWROG accepts

TSTF Resolution: **Approved** Date: 30-Apr-96

NRC Review Information

NRC Received Date: 17-Jul-96 NRC Reviewer: Gilles, N.

NRC Comments:

9/18/96 - Review pending.
3/14/97 - NRC approves.

Final Resolution: **NRC Approves**

Final Resolution Date: 14-Mar-97

Incorporation Into the NUREGs

4/2/98

File to BBS/LAN Date:

TSTF Informed Date:

TSTF Approved Date:

NUREG Rev Incorporated:

Affected Technical Specifications

LCO 3.0.4 LCO Applicability

LCO 3.0.4 Bases LCO Applicability

TSTF-104

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

SR 3.0.4 is only applicable for entry into a Mode or other specified condition in the Applicability in Modes 1, 2, 3 and 4.

Reviewer's Note: LCO 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, LCO 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in LCO 3.0.4 were previously applicable in all MODES. Before this version of LCO 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS.

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.

(continued)

BASES

LCO 3.0.4 (continued) 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.

Insert

Exceptions to LCO 3.0.4 are stated in the individual Specifications. 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 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, 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 MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS or individual specifications sufficiently define the remedial measures to be taken. [In some cases (e.g., ..) 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.]

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, 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 3.0.5 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

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3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

LCO 3.0.4 is only applicable for entry into a MODE or others specified condition in the Applicability in MODES 1, 2, 3, and 4.

Reviewers's Note: LCO 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, LCO 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in LCO 3.0.4 were previously applicable in all MODES. Before this version of LCO 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS.

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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.

(continued)

BASES

LCO 3.0.4
(continued)

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.

Insert

Exceptions to LCO 3.0.4 are stated in the individual Specifications. 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 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3, 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 MODES 1, 2, 3, or 4. The requirements of LCO 3.0.4 do not apply in MODES 5 and 6, or in other specified conditions of the Applicability (unless in MODES 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken. [In some cases (e.g., ..) 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.]

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, 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 3.0.5

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

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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.

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LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.

Reviewers's Note: LCO 3.0.4 has been revised so that changes in MODES or other specified conditions in the Applicability that are part of a shutdown of the unit shall not be prevented. In addition, LCO 3.0.4 has been revised so that it is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4. The MODE change restrictions in LCO 3.0.4 were previously applicable in all MODES. Before this version of LCO 3.0.4 can be implemented on a plant-specific basis, the licensee must review the existing technical specifications to determine where specific restrictions on MODE changes or Required Actions should be included in individual LCOs to justify this change; such an evaluation should be summarized in a matrix of all existing LCOs to facilitate NRC staff review of a conversion to the STS.

LCO 3.0.5

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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.

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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, 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 3.0.5

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

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3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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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.

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LCO 3.0.5

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BASES

LCO 3.0.4
(continued)

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.

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BASES

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3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

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Insert

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.