

5928-05-30056
February 24, 2005

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Three Mile Island, Unit 1 (TMI Unit 1)
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Response to Request for Additional Information Concerning
Technical Specification Change Request on Surveillance Criteria

- References:
- 1) USNRC letter dated January 19, 2005, "Request for Additional Information (RAI) - Missed Surveillance Criteria Based on Technical Specification Task Force (TSTF)-358, Revision 6, and Inclusion of a Bases Control Program for Three Mile Island Nuclear Station, Unit 1 (TMI-1) (TAC No. MC3653).
 - 2) AmerGen letter 5928-04-20132 dated June 24, 2004, Technical Specification Change Request No. 325 – Missed Surveillance Criteria and Inclusion of a Bases Control Program based on TSTF-358.

This letter provides additional information as requested by the NRC staff in Reference 1. The request for information is in regards to AmerGen Energy Company's Technical Specification Change Request (TSCR) No. 325 (Reference 2) to revise the required actions and time restraints for missed surveillance requirements. The TSCR would adopt surveillance requirement (SR) 3.0.3 in the Standard Technical Specifications (STS) for a missed surveillance requirement.

In reference 1, the NRC staff concluded that to adopt and implement SR 3.0.3, plants with custom Technical Specifications such as TMI-1 must have identical requirements for what it means to meet a surveillance requirement. Another surveillance requirement in the STS, SR 3.0.1, establishes those requirements. Accordingly, the NRC staff requests a licensee response using either of two options. Option 1 is to incorporate STS SR 3.0.1 and associated bases into the TMI-1 Technical Specifications (TS). Option 2 is to provide a justification that the current TMI-1 TS have equivalent requirements to SR 3.0.1, and adopt the STS SR 3.0.1 Bases.

We have elected to use Option 2 in responding to this request for additional information, with the justification presented in Enclosure 1. As discussed in the enclosure, the interpretation of both STS SR 3.0.1 and the TMI-1 TS results in equivalent surveillance requirements, or the distinctions do not result in different interpretations of the SRs. Further, as specified in Option 2, the STS Bases for SR 3.0.1, with editorial revisions to reflect TMI-1 TS nomenclature and content, will be incorporated into the TMI-1 TS Bases in accordance with the Technical Specification Bases Control Program upon implementation of the approved amendment. This planned addition to the Bases is presented in Enclosure 2, and will reinforce the conclusions presented in Enclosure 1. Option 1 is not the preferred approach since it involves an amended TSCR requiring a review by both safety review committees that would be an unnecessary utilization of staff resources without any measurable benefits.

Enclosure 3 provides a revised mark-up TS page 4-1 for TSCR 325, and Enclosure 4 provides the revised retyped TS pages for TSCR 325 that incorporates the Bases presented in Enclosure 2.

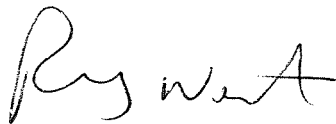
If any additional information is needed, please contact Dave Robillard at (610) 765-5952.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

2-24-05

Executed On



R. G. West
TMI-1 Site Vice President
AmerGen Energy Company, LLC

Enclosures

cc: S. J. Collins, Administrator, USNRC Region 1
D. M. Skay, USNRC Senior Project Manager, TMI Unit 1
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File No. 04088

ENCLOSURE 1

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND, UNIT 1

TECHNICAL SPECIFICATION CHANGE REQUEST 325

REGARDING SURVEILLANCE CRITERIA

Response to NRC Request for Additional Information

NRC Request

Standard Technical Specification (STS) SR 3.0.3 addresses the situation of a missed surveillance, a surveillance that was not performed within its required frequency, and the resulting implications for considering the surveillance and associated limiting condition for operation not met. To accurately adopt and implement SR 3.0.3, the plants with custom Technical Specifications (TS) must have or must establish identical requirements for what it means to meet a surveillance requirement (SR). STS SR 3.0.1 establishes those requirements. So, for a custom TS plant to adopt SR 3.0.3, it must do either of the following options:

1. Adopt STS SR 3.0.1 and associated Bases, or
2. Show that their custom TS have equivalent requirements to SR 3.0.1, and adopt the STS SR 3.0.1 Bases.

There are four sentences to STS SR 3.0.1, and each sentence is a requirement. Custom-TS plants not adopting STS SR 3.0.1 must describe how their TS contain these four elements.

Response

We have elected to respond in accordance with Option 2. The following compares the four sentences of STS SR 3.0.1 with TMI-1 SR 4.0.1 and other requirements of the TMI-1 TS:

First Sentence of STS SR 3.0.1:

The first sentence of STS SR 3.0.1 reads as follows:

“SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR.”

The first sentence of TMI-1 SR 4.0.1 states the same requirement using the converse of the STS wording, and uses nomenclature that is equivalent to the STS nomenclature. The sentence is worded as follows: **“During Reactor Operational Conditions for which a Limiting Condition for Operation (LCO) does not require a system/component to be operable, the associated surveillance requirements do not have to be performed.”**

The STS requires a SR during plant conditions when the system, or component (SC) is required by the TS to be operable. The TMI-1 TS words this requirement by stating that when plant conditions do not require the SC to be operable, the SR does not need to be performed. The interpretation of both the STS and TMI-1 requirements is the same. If the SR is not required when the SC is not required to be operable, then the only logical

conclusion is that the SR must be performed when the SC is required to be operable. Otherwise, the statement would be superfluous. In any case, the specific SRs in the TMI-1 TS Section 4 clearly identify the plant conditions that require each SR. Further, the Objective section of the TMI-1 SRs identify that the purpose of the SRs is to assure operability, or verify the design function, of the subject SC. This sentence in the TS does not modify or alter the interpretation of the TS SRs since these requirements are clearly specified in the TS sections for each SC.

The phrase in the STS, "unless otherwise stated in the SR," does not represent a distinct requirement since exceptions to a TMI-1 SR are identified in the specific TMI-1 SR. The STS refers to the Applicability section for LCOs. TMI-1 plant conditions requiring an LCO or SR are not specified in the Applicability section of the TMI-1 TS. Rather, the plant conditions are specified in the individual SRs for each SC. Further, the TMI-1 TS identifies the applicable plant operability conditions as "Reactor Operational Conditions" in the definition section, not as "Modes." For these reasons the nomenclature in the custom TMI-1 TS must be distinct from the STS.

Therefore, the interpretation of the first sentence of both the STS and the TMI-1 TS are equivalent.

Second Sentence of STS SR 3.0.1:

The second sentence of STS 3.0.1 reads as follows:

"Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO."

The second sentence of TMI-1 SR 4.0.1 reads as follows: **"Prior to declaring a system/component operable, the associated surveillance requirement must be current."** The interpretation of these sentences in the STS and TMI-1 TS is the same. The reference to "LCO" in the STS is equivalent to "system/component operable" in the TMI-1 TS since the operability requirements are identified in the LCOs. The only logical interpretation of the phrase in the TMI-1 TS, "associated surveillance requirement must be current," is that the SR for the associated system/component (SC) must have been completed, and the results of that SR must be satisfactory, for the SC to be considered operable.

Essentially, the thought that is conveyed by the STS is that failure of the SR renders the SC inoperable. The thought conveyed by the TMI-1 TS is that for the SC to be operable, a satisfactory surveillance must be completed. The interpretation of these two thoughts is identical. In any case, the specific SRs in the TMI-1 TS Section 4 clearly identify the plant conditions that require each SR.

The only distinctions between the STS and TMI-1 TS regarding this requirement is the phrase in the STS that "or between performance of the Surveillance." This phrase refers to other conditions or activities that result in a conclusion that the SC would not satisfy the SR, and associated SC shall be considered inoperable. The absence of this phrase in the TMI-1 TS does not result in an interpretation that is different from the STS for the following reasons.

The process of determining SC operability is not limited to the results of surveillance tests/inspections performed in accordance with the TS. Operability determinations are universally recognized by the industry as any condition or activity that identifies a SC to be inoperable, and that any condition of inoperability must be considered in determining compliance with the TS LCOs. As discussed in the Exelon procedure for operability determinations (Reference 1), the process of ensuring operability is ongoing and continuous. Operability is verified by day-to-day operation, plant tours, observation from the control room, surveillances, test programs, and other activities. Further, failure to comply with the TS LCOs and safety limits is not the only acceptance criteria that may result in a determination of inoperability. Deficiencies in the design basis or safety analysis may also result in a determination of inoperability. Other licensing documents in addition to the TS also identify operability criteria; e.g., Offsite Dose Calculation Manual.

Both the STS and TMI-1 TS define operability as follows:

"a system, subsystem, division, component, or device shall be operable or have operability when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, division, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s)."

This definition of operability does not limit the operability acceptance criteria to only the TS LCOs and safety limits, nor does it limit operability determinations to only TS surveillance tests/inspections. Accordingly, the absence of the phrase "or between performance of the surveillance" does not change the interpretation of the TS regarding the determination of SC operability. Incorporating STS 3.0.1 Bases into the TMI-1 Bases will reinforce this conclusion.

Therefore, the interpretation of the second sentence of both the STS and TMI-1 TS are equivalent.

Third Sentence of STS SR 3.0.1:

The third sentence of STS SR 3.0.1 reads as follows:

“Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3.”

Except for the referenced SR numbers, the third sentence of TMI-1 SR 4.0.1 is identical in wording. It reads: **“Failure to perform a surveillance within the specified Frequency shall be failure to meet the LCO except as provided in 4.0.2.”** STS SR 3.0.3 and TMI-1 SR 4.0.2 both address the actions to be taken in response to a missed surveillance requirements and were the subject of TSCR-325 (Reference 2).

Therefore, the interpretation of the third sentence of both the STS and the TMI-1 TS are equivalent.

Fourth Sentence of STS SR 3.0.1:

The fourth sentence of STS SR 3.0.1 reads as follows:

“Surveillances do not have to be performed on inoperable equipment or variables outside specified limits”

TMI-1 TS does not contain a similar statement. When a system/equipment (SC) is determined to be inoperable the LCO required actions specify the remedial measures to maintain the plant in a safe configuration. For this reason, it is generally the practice not to perform TS surveillances on inoperable equipment or when variables are outside specified limits. There may be unforeseen situations where a surveillance is performed on an inoperable SC. These situations are rare, and the surveillance will be performed in a manner that does not compromise plant safety.

In any case, this STS statement neither prohibits nor mandates surveillances of inoperable SC. The statement is worded such that the performance of surveillances on inoperable SC is optional. The TMI-1 practice as described above conforms to the STS statement.

Therefore, the absence of this statement in the TMI-1 TS does not change the implementation of the TMI-1 TS SR.

Conclusion

As discussed above, the custom TMI-1 TS 4.0.1 and STS SR 3.0.1 either identify equivalent requirements, or the distinctions do not result in different interpretations of the

surveillance requirements. Further, incorporating the STS SR 3.0.1 Bases, that repeats the SR as stated, into the TMI-1 Bases will reinforce the interpretations described herein.

References

1. Exelon procedure LS-AA-105, revision 1, "Operability Determinations."
2. AmerGen letter 5928-04-20132 dated June 24, 2004, Technical Specification Change Request No. 325 – Missed Surveillance Criteria and Inclusion of a Bases Control Program based on TSTF-358.

ENCLOSURE 2

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND, UNIT 1

TECHNICAL SPECIFICATION CHANGE REQUEST 325

REGARDING SURVEILLANCE CRITERIA

Bases for TMI-1 Surveillance Requirement 4.0.1

The following bases for SR 4.0.1 will be incorporated into the TMI-1 TS Bases in accordance with the Technical Specification Bases Control Program (TSBCP) upon implementation of the approved amendment and is provided for your information. This bases deviates from the STS 3.0.1 Bases where editorial revisions were necessary to reflect TMI-1 TS nomenclature and content. Future revisions, if required, to the Bases will be performed in accordance with the TSBCP. This addition to the bases is presented as Insert 5 to the revised TS mark-up in TSCR No. 325 shown in Enclosure 3. Enclosure 4 incorporates this addition into the revised TS pages 4-1, 4-1a, and new page 4-1b associated with TSCR No. 325.

INSERT 5:

"SR 4.0.1 establishes the requirement that SRs must be met during the REACTOR OPERATING CONDITIONS or other specified conditions in the SRs for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This specification is to ensure that surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a surveillance within the specified frequency, in accordance with definition 1.25, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified frequency.

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

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

Surveillances do not have to be performed when the unit is in a REACTOR OPERATING CONDITION or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given REACTOR OPERATING CONDITION or other specified condition.

Surveillances, including surveillances invoked by LCO required actions, do not have to be performed on inoperable equipment because the actions define the remedial measures

that apply. Surveillances have to be met and performed in accordance with the specified frequency, prior to returning equipment to OPERABLE status.

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

Some examples of this process are:

- a. Emergency feedwater (EFW) pump maintenance during refueling that requires testing at steam pressures greater than 750 psi. However, if other appropriate testing is satisfactorily completed, the EFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the EFW pump testing.
- b. High pressure injection (HPI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing."

ENCLOSURE 3

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND, UNIT 1

TECHNICAL SPECIFICATION CHANGE REQUEST 325

REGARDING SURVEILLANCE CRITERIA

Revised Technical Specification Bases Change (Mark-up)

Page

4-1

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4. SURVEILLANCE STANDARDS

4.0.1 During Reactor Operational Conditions for which a Limiting Condition for Operation (LCO) does not require a system/component to be operable, the associated surveillance requirements do not have to be performed. Prior to declaring a system/component operable, the associated surveillance requirement must be current. Failure to perform a surveillance within the specified Frequency shall be failure to meet the LCO except as provided in 4.0.2.

4.0.2 If it is discovered that a surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is ~~less~~. This delay period is permitted to allow performance of the Surveillance. ← INSERT 1

Bases

INSERT 5

← SR 4.0.2
This ~~specification~~ establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours applies from the point in time that it is discovered that the required surveillance has not been performed, and not at the time that the specified frequency was not met.

The delay period provides an adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

INSERT 2
DELETE
When a surveillance with a frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, this provision allows the full delay period of 24 hours to perform the surveillance.

DELETE
Failure to comply with specified surveillance frequencies is expected to be an infrequent occurrence. Use of the delay period is not intended to be used as an operational convenience to extend surveillance intervals.

INSERT 3
If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the completion times of the required actions for the applicable LCO conditions begin

ENCLOSURE 4

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND, UNIT 1

TECHNICAL SPECIFICATION CHANGE REQUEST 325

REGARDING SURVEILLANCE CRITERIA

Revised Technical Specification Bases Pages

Pages

4-1
4-1a
4-1b (new)

4. SURVEILLANCE STANDARDS

4.0.1 During Reactor Operational Conditions for which a Limiting Condition for Operation (LCO) does not require a system/component to be operable, the associated surveillance requirements do not have to be performed. Prior to declaring a system/component operable, the associated surveillance requirement must be current. Failure to perform a surveillance within the specified Frequency shall be failure to meet the LCO except as provided in 4.0.2.

4.0.2 If it is discovered that a surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable condition(s) must be entered.

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

Bases

SR 4.0.1 establishes the requirement that SRs must be met during the REACTOR OPERATING CONDITIONS or other specified conditions in the SRs for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This specification is to ensure that surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a surveillance within the specified frequency, in accordance with definition 1.25, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified frequency.

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

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

Surveillances do not have to be performed when the unit is in a REACTOR OPERATING CONDITION or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given REACTOR OPERATING CONDITION or other specified condition.

Surveillances, including surveillances invoked by LCO required actions, do not have to be performed on inoperable equipment because the actions define the remedial measures that apply. Surveillances have to be met and performed in accordance with the specified frequency, prior to returning equipment to OPERABLE status.

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

Some examples of this process are:

- a. Emergency feedwater (EFW) pump maintenance during refueling that requires testing at steam pressures greater than 750 psi. However, if other appropriate testing is satisfactorily completed, the EFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the EFW pump testing.
- b. High pressure injection (HPI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

SR 4.0.2 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time that it is discovered that the required surveillance has not been performed in accordance with Surveillance Standard 4.0.2 and not at the time that the specified frequency was not met.

The delay period provides an adequate time to complete surveillances that have been missed. This delay period permits the completion of a surveillance before complying with required actions or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

Bases (Contd.)

When a surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering power operation after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, Surveillance Standard 4.0.2 allows for the full delay period of up to the specified frequency to perform the surveillance. However, since there is not a time interval specified, the missed surveillance should be performed at the first reasonable opportunity.

Surveillance Standard 4.0.2 provides a time limit for, and allowances for the performance of, surveillances that become applicable as a consequence of operating condition changes imposed by required LCO actions.

Failure to comply with specified surveillance frequencies is expected to be an infrequent occurrence. Use of the delay period established by Surveillance Standard 4.0.2 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed surveillance, it is expected that the missed surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the surveillance as well as any plant configuration changes required or shutting the plant down to perform the surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65 (a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants'. This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed surveillances will be placed in the licensee's Corrective Action Program.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the 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 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.