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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 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.

6.17 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS

6.17.1 Licensee initiated safety related changes to the radioactive waste system (liquid, gaseous and solid):

1. Shall be reported to the Commission in the Annual Report (Specification 6.9.1B) for the period in which the evaluation was reviewed. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. Sufficient detailed information to totally support the reason for the change *without benefit of additional or supplemental information*;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change which shows the expected maximum exposures to individuals in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating personnel as a result of the change; and
 - h. Documentation of the fact that the change was reviewed and approved.
2. Shall become effective upon review and approval in accordance with Section 6.5.1.

6.18 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 - 1. A change in the TS incorporated in the license or
 - 2. A change to the updated FSAR (UFSAR) or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the UFSAR.
- d. Proposed changes that meet the criteria of Specification 6.18.b.1 or 6.18.b.2 above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71 (e).