

## DISTRIBUTION CONTROL LIST

Document Name: ITS/BASES/TRM

CC_NAME	NAME	DEPT	LOCATION
1	OPS PROCEDURE GROUP SUPV.	OPS PROCEDURE GROUP	IP2
3	PLANT MANAGER'S OFFICE	UNIT 3 (UNIT 3/IPEC ONLY)	IP2
5	CONTROL ROOM & MASTER	OPS (3PT-D001/6 (U3/IPEC)	IP3 (ONLY)
11	RES DEPARTMENT MANAGER	RES (UNIT 3/IPEC ONLY)	45-4-A
19	STEWART ANN	LICENSING	GSB-2D
20	CHEMISTRY SUPERVISOR	CHEMISTRY DEPARTMENT	45-4-A
21	TSC (IP3)	EEC BUILDING	IP2
22	SHIFT MGR. (LUB-001-GEN)	OPS (UNIT 3/IPEC ONLY)	IP3
23	LIS	LICENSING & INFO SERV	OFFSITE
25	SIMULATOR	TRAIN (UNIT 3/IPEC ONLY)	48-2-A
28	RESIDENT INSPECTOR	US NRC 88' ELEVATION	IP2
32	EOF	E-PLAN (ALL EP'S)	EOF
47	CHAPMAN N	BECHTEL	OFFSITE
50	TADEMY L. SHARON	WESTINGHOUSE ELECTRIC	OFFSITE
55	GSB TECHNICAL LIBRARY	A MCCALLION/IPEC & IP3	GSB-3B
61	SIMULATOR	TRAIN (UNIT 3/IPEC ONLY)	48-2-A
69	CONROY PAT	LICENSING/ROOM 205	GSB-2D
99	BARANSKI J (ALL)	ST. EMERG. MGMT. OFFICE	OFFSITE
106	SIMULATOR INSTRUCT AREA	TRG/3PT-D001-D006 ONLY)	#48
164	CONTROL ROOM & MASTER	OPS (3PT-D001/6 (U3/IPEC)	IP3 (ONLY)
207	TROY M	PROCUREMENT ENG.	GSB-4B
273	FAISON CHARLENE	NUCLEAR LICENSING	WPO-12
319	L.GRANT (LRQ-OPS TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
354	L.GRANT (LRQ-OPS/TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
357	L.GRANT (ITS/INFO ONLY)	TRAINING - ILO CLASSES	48-2-A
424	GRANT LEAH (9 COPIES)	(UNIT 3/IPEC ONLY)	#48
474	OUELLETTE P	ENG., PLAN & MGMT INC	OFFSITE
483	SCHMITT RICHIE	MAINTENANCE ENG/SUPV	45-1-A
484	HANSLER ROBERT	REACTOR ENGINEERING	72'UNIT 2
489	CLOUGHNESSY PAT	PLANT SUPPORT TEAM	GSB-3B
492	FSS UNIT 3	OPERATIONS	K-IP-I210
493	OPERATIONS FIN TEAM	33 TURBIN DECK	45-1-A
494	AEOF/A.GROSJEAN (ALL EP'S)	E-PLAN (EOP'S ONLY)	WPO-12D
495	JOINT NEWS CENTER	EMER PLN (ALL EP'S)	EOF
496	L.GRANT (LRQ-OPS/TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
497	L.GRANT (LRQ-OPS/TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
500	L.GRANT (LRQ-OPS TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
501	L.GRANT (LRQ-OPS TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
512	L.GRANT (LRQ-OPS TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
513	L.GRANT (LRQ-OPS TRAIN)	LRQ (UNIT 3/IPEC ONLY)	#48
518	DOCUMENT CONTROL DESK	NRC (ALL EP'S)	OFFSITE
527	MILIANO PATRICK	NRC/SR. PROJECT MANAGER	OFFSITE
529	FIELDS DEBBIE	OUTAGE PLANNING	IP3/OSB

A001

	<b>IPEC SITE MANAGEMENT MANUAL</b>	<b>QUALITY RELATED ADMINISTRATIVE PROCEDURE</b>	<b>IP-SMM-AD-103</b> <b>Revision 0</b>
		<b>INFORMATIONAL USE</b>	<b>Page 13 of 21</b>

**ATTACHMENT 10.1** **SMM CONTROLLED DOCUMENT TRANSMITTAL FORM**

**SITE MANAGEMENT MANUAL CONTROLLED DOCUMENT TRANSMITTAL FORM - PROCEDURES**  
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		<b>CONTROLLED DOCUMENT TRANSMITTAL FORM - PROCEDURES</b>	
<b>TO: DISTRIBUTION</b>		<b>DATE: 8/17/05</b>	<b>PHONE NUMBER: 271-7057</b>
<b>FROM: IPEC DOCUMENT CONTROL</b>			
The Document(s) identified below are forwarded for use. In accordance with IP-SMM-AD-103, please review to verify receipt, incorporate the document(s) into your controlled document file, properly disposition superseded, void, or inactive document(s). Sign and return the receipt acknowledgement below within fifteen (15) working days.			
<b>AFFECTED DOCUMENT:</b>		<b>IP3 ITS / BASES / TRM</b>	
<b>DOC #</b>	<b>REV #</b>	<b>TITLE</b>	<b>INSTRUCTIONS</b>
<p>*****<b>FOLLOW THE ATTACHED INSTRUCTIONS</b>*****</p> <p>*****<b>PLEASE NOTE EFFECTIVE DATE</b>*****</p>			
RECEIPT OF THE ABOVE LISTED DOCUMENT(S) IS HEREBY ACKNOWLEDGED. I CERTIFY THAT ALL SUPERSEDED, VOID, OR INACTIVE COPIES OF THE ABOVE LISTED DOCUMENT(S) IN MY POSSESSION HAVE BEEN REMOVED FROM USE AND ALL UPDATES HAVE BEEN PERFORMED IN ACCORDANCE WITH EFFECTIVE DATE(S) (IF APPLICABLE) AS SHOWN ON THE DOCUMENT(S).			
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## UPDATE FOR IP3 TECHNICAL REQUIREMENTS MANUAL

AFFECTED SECTION	REMOVE	INSERT
List of Effective Sections	Page 1 of 1 with Effective date 05/24/2005	Page 1 of 1 with Effective date 08/22/2005
Section 3.0	Pages 3.0-1 through 3.0-15 Revision 1	Pages 3.0-1 through 3.0-16 Revision 2
Section 3.7	Pages 3.7-1 through 3.7-17 Revision 2	Pages 3.7-1 through 3.7-17 Revision 3

LIST OF EFFECTIVE SECTIONS

TRM SECTION	Rev	Page(s)	EFFECTIVE DATE
Table of Contents	2	i through iii	12/04/2002
1.1	3	1.1-1 through 5	04/05/2005
1.2	0	1.2-1 through 3	03/19/2001
1.3	0	1.3-1 through 8	03/19/2001
1.4	0	1.4-1 through 4	03/19/2001
2.0	0	2.0-1	03/19/2001
3.0	2	3.0-1 through 16	08/22/2005
3.1.A	1	3.1.A-1 through 8	07/06/2001
3.1.B	0	3.1.B-1	03/19/2001
3.1.C.1	1	3.1.C.1-1 through 8	03/06/2003
3.1.C.2	1	3.1.C.2-1 through 6	03/06/2003
3.2.A	0	3.2.A-1	03/19/2001
3.3.A	1	3.3.A-1 through 3	08/24/2004
3.3.B	3	3.3.B-1 through 12	10/28/2004
3.3.C	0	3.3.C-1 through 5	03/19/2001
3.3.D	2	3.3.D-1 through 20	09/03/2003
3.3.E	1	3.3.E-1 through 3	08/24/2004
3.3.F	1	3.3.F-1 through 3	08/24/2004
3.3.G	0	3.3.G-1 through 2	03/19/2001
3.3.H	1	3.3.H-1 through 2	08/24/2004
3.3.I		--- NOT USED ---	
3.3.J	1	DELETED	04/05/2005
3.4.A	1	3.4.A-1 through 2	04/05/2005
3.4.B	0	3.4.B-1 through 3	03/19/2001
3.4.C	0	3.4.C-1 through 2	03/19/2001
3.4.D	0	3.4.D-1 through 2	03/19/2001
3.5.A	0	3.5.A-1 through 2	03/19/2001
3.6	0	3.6-1	03/19/2001
3.7.A.1	1	3.7.A.1-1 through 5	08/24/2004
3.7.A.2	2	3.7.A.2-1 through 3	08/24/2004
3.7.A.3	5	3.7.A.3-1 through 6	08/24/2004
3.7.A.4	3	3.7.A.4-1 through 3	08/24/2004
3.7.A.5	1	3.7.A.5-1 through 3	08/24/2004
3.7.A.6	1	3.7.A.6-1 through 2	08/24/2004
3.7.A.7	2	3.7.A.7-1 through 4	08/24/2004
3.7.B	3	3.7.B-1 through 17	08/22/2005
3.7.C	0	3.7.C-1 through 8	03/19/2001
3.7.D	0	3.7.D-1 through 2	03/19/2001
3.7.E	0	3.7.E-1 through 2	03/19/2001
3.8.A	0	3.8.A-1 through 5	03/19/2001
3.8.B	0	3.8.B-1 through 7	03/19/2001

TRM SECTION	Rev	Page(s)	EFFECTIVE DATE
3.8.C	2	3.8.C-1 through 10	01/25/2005
3.8.D	0	3.8.D-1 through 2	03/19/2001
3.9	0	3.9-1	03/19/2001
4.0	0	4.0-1	03/19/2001
5.0	5	5.0-1 through 7	05/24/2005

### 3.0 TECHNICAL REQUIREMENTS FOR OPERATION (TRO) APPLICABILITY

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**TRO 3.0.A** TROs shall be met during the MODES or other specified conditions in the Applicability, except as provided in TRO 3.0.B and TRO 3.0.H.

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**TRO 3.0.B** Upon discovery of a failure to meet a TRO, the Required Actions of the associated Conditions shall be met, except as provided in TRO 3.0.E.

If the TRO 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.

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**TRO 3.0.C** When a TRO 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 TRO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Technical Requirement are stated in the individual Technical Requirements or as allowed via an approved Reasonable Assurance of Safety per TRO 3.0.H.

Where corrective measures are completed that permit operation in accordance with the TRO or ACTIONS, completion of the actions required by TRO 3.0.C is not required.

TRO 3.0.C is only applicable in MODES 1, 2, 3, and 4.

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**TRO 3.0.D** When a TRO 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 Technical Requirement 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 Technical Requirement are stated in the individual Technical Requirements. 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.

TRO 3.0.D is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.

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TRO 3.0.E	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 TRO 3.0.B for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.
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TRO 3.0.F	Not used (see bases).
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TRO 3.0.G	Not used (see bases).
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TRO 3.0.H	Exceptions to a TRO, TRS, Required Action or Completion Time, including a plant shutdown required by an individual TRM Technical Requirement or by TRO 3.0.C, may be exercised based on an approved Reasonable Assurance of Safety performed in accordance with plant procedures.
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TRO 3.0.H may be exercised against TRO 3.0.A, 3.0.B, 3.0.C and 3.0.D.

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TECHNICAL REQUIREMENTS SURVEILLANCE (TRS) APPLICABILITY

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**TRS 3.0.A** TRSs shall be met during the MODES or other specified conditions in the Applicability for individual TROs, unless otherwise stated in the TRS. 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 TRO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the TRO except as provided in TRS 3.0.C. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

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**TRS 3.0.B** The specified Frequency for each TRS is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Technical Requirement are stated in the individual Technical Requirements.

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**TRS 3.0.C** If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the TRO 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 TRO 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 TRO must immediately be declared not met, and the applicable Condition(s) must be entered.

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TRS 3.0.D Entry into a MODE or other specified condition in the Applicability of a TRO shall not be made unless the TRO'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.

TRS 3.0.D is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3 and 4.

TRS 3.0.E The following criteria provides relaxation to TRS 3.0.A for performing surveillances:

- i) For surveillances that are new, the first performance is due at the end of the first surveillance interval that begins on the effective date of the TRM section.
- ii) For surveillances that existed prior to the effective date of the TRM section whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after the effective date of the TRM section.
- iii) For surveillances that existed prior to the TRM section effective date that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the effective date of the TRM section.
- iv) For surveillances that existed prior to the TRM section effective date whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the effective date of the TRM section.

BASES

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TROs TRO 3.0.A through TRO 3.0.H establish the general requirements applicable to all Technical Requirements and apply at all times, unless otherwise stated.

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TRO 3.0.A TRO 3.0.A establishes the Applicability statement within each individual Technical Requirement as the requirement for when the TRO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Technical Requirement).

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TRO 3.0.B TRO 3.0.B establishes that upon discovery of a failure to meet a TRO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of a TRO are not met. This Technical Requirement establishes that:

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

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

Completing the Required Actions is not required when a TRO is met or is no longer applicable, unless otherwise stated in the individual Technical Requirements.

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be

completed even though the associated Conditions no longer exist. The individual TRO's ACTIONS specify the Required Actions where this is the case. An example of this is TRO 3.7.C, "Snubbers".

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time conditions exist which may result in TRO 3.0.C being entered. Individual Technical Requirements may specify a time limit for performing a TRS when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires; if the equipment remains removed from service or bypassed.

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

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TRO 3.0.C

TRO 3.0.C establishes the actions that must be implemented when a TRO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies; or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit.

Sometimes, possible combinations of Conditions are such that entering TRO 3.0.C is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that TRO 3.0.C be entered immediately.

This Technical Requirement delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the TRO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering TRO 3.0.C, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Technical Requirement applies. The use and interpretation of specified times to complete the actions of TRO 3.0.C are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with TRO 3.0.C may be terminated and TRO 3.0.C exited if any of the following occurs:

- a. The TRO is now met.
- b. A Condition exists for which the Required Actions have now been performed.
- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time TRO 3.0.C is exited.
- d. An exception as per TRO 3.0.H has been implemented via an approved Reasonable Assurance of Safety.

The time limits of Technical Requirement 3.0.C allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation.

If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies.

If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, TRO 3.0.C provides actions for Conditions not covered in other Technical Requirements. The requirements of TRO 3.0.C do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by TRO 3.0.C. The requirements of TRO 3.0.C do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Technical Requirements sufficiently define the remedial measures to be taken.

Exceptions to TRO 3.0.C are provided in instances where requiring a unit shutdown, in accordance with TRO 3.0.C, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in TRO 3.3.H, "Explosive Gas Monitoring Instruments." TRO 3.3.H has an Applicability of "During Waste Gas Holdup System Operation." Therefore, this TRO is applicable in any or all MODES. If the TRO and the Required Actions of TRO 3.3.H 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 TRO 3.3.H of "Stop operation of the waste gas holdup system" is the appropriate Required Action to complete in lieu of the actions of TRO 3.0.C. These exceptions are addressed in the individual Technical Requirements.

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**TRO 3.0.D**

TRO 3.0.D establishes limitations on changes in MODES or other specified conditions in the Applicability when a TRO 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 TRO would not be met in the Applicability desired to be entered; and

- b. Continued noncompliance with the TRO 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 Technical Requirement should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of TRO 3.0.D 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 TRO 3.0.D shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to TRO 3.0.D are stated in the individual Technical Requirements. The exceptions allow entry in MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for a continuous period of time. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Technical Requirement.

TRO 3.0.D 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, TRO 3.0.D is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of TRO 3.0.D 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 Technical Requirements sufficiently define the remedial measures to be taken.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by TRS 3.0.A. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, in compliance with TRO 3.0.D or where an exception to TRO 3.0.D is stated, is not a violation of TRS 3.0.A or TRS 3.0.D for those Surveillances that do not have to be performed due to the associated inoperable equipment.

However, TRSs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected TRO.

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TRO 3.0.E	<p>TRO 3.0.E 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 Technical Requirement is to provide an exception to TRO 3.0.B (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:</p> <ul style="list-style-type: none"><li>a. The OPERABILITY of the equipment being returned to service; or</li><li>b. The OPERABILITY of other equipment.</li></ul> <p>The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Technical Requirement does not provide time to perform any other preventive or corrective maintenance.</p> <p>An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a Secondary Steam Isolation Valve that has been closed to comply with the Applicability statement and must be reopened to perform the TRS 3.7.B.12.</p>
TRO 3.0.F	<p>The corresponding Technical Specification LCO 3.0.6 that provides exceptions to cascading is not allowed for use in the TRM.</p>
TRO 3.0.G	<p>The corresponding Technical Specification LCO 3.0.7 that provides exceptions for special test specifications is not utilized in the TRM, since the TRM has no special test specification.</p>
TRO 3.0.H	<p>Allowed outage time and compensatory actions for TRM items represent judgements based on safety significance as discussed in the provisions of Generic Letter 91-18 for assessing continued operation when systems in the TRM are inoperable. The provision for altering a required action or completion time using a Reasonable Assurance of Safety as defined by the GL is the action prescribed by the GL when non-technical specification equipment is inoperable. Providing this provision eliminates the administrative burden of revising the TRM for individual or unique circumstances.</p>

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BASES

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TRSs TRS 3.0.A through TRS 3.0.D establish the general requirements applicable to all Technical Requirements and apply at all times, unless otherwise stated.

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TRS 3.0.A TRS 3.0.A establishes the requirement that TRSs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the TRO apply, unless otherwise specified in the individual TRSs. This Technical Requirement 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 TRS 3.0.B, constitutes a failure to meet a TRO.

Systems and components are assumed to be OPERABLE when the associated TRSs have been met. Nothing in this Technical Requirement, 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 TRSs; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated TRO are not applicable, unless otherwise specified.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given TRS. In this case, the unplanned event may be credited as fulfilling the performance of the TRS. This allowance includes those TRSs whose performance is normally precluded in a given MODE or other specified condition.

Surveillances, including Surveillances invoked by 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 TRS 3.0.B, 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 TRS 3.0.B. Post maintenance testing may not be possible in the current MODE or other specified conditions in the

Applicability 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 MODE or other specified condition where other necessary post maintenance tests can be completed.

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TRS 3.0.B

TRS 3.0.B establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

TRS 3.0.B permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the TRSs. The exceptions to TRS 3.0.B are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Technical Requirements. An example of where TRS 3.0.B does not apply is TRS 3.8.A.2. The analysis does not support the 25% extension. Therefore, there is a Note in the Frequency stating, "TRS 3.0.B is not applicable."

As stated in TRS 3.0.B, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action is considered a single action with a single Completion Time.

One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of TRS 3.0.B are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

TRS 3.0.C

TRS 3.0.C 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 Surveillance has not been performed in accordance with TRS 3.0.B, and not at the time that the specified Frequency was not met.

This delay period provides 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.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operating situations (e.g., prior to entering MODE 1 after each fuel loading) is discovered to not have been performed when specified, TRS 3.0.C 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.

TRS 3.0.C provided a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for TRSs is expected to be an infrequent occurrence. Use of the delay period established by TRS 3.0.C 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 is 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 TRO 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 TRO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Technical Requirement, or within the Completion Time of the ACTIONS, restores compliance with TRS 3.0.A.

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**TRs 3.0.D**

TRs 3.0.D establishes the requirement that all applicable TRSs must be met before entry into a MODE or other specified condition in the Applicability.

This Technical Requirement 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 Technical Requirement should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

However, in certain circumstances, failing to meet a TRS will not result in TRS 3.0.D 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 TRRS(s) are not required to be performed, per TRRS 3.0.A, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, TRRS 3.0.D does not apply to the associated TRRS(s) since the requirement for the TRRS(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an TRRS 3.0.D restriction to changing MODES or other specified conditions of the Applicability. However, since the TRO is not met in this instance, TRO 3.0.D will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of TRS 3.0.D 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 TRO 3.0.D 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 TRSs are specified such that exceptions to TRS 3.0.D are not necessary. The specific time frames and conditions necessary for meeting the TRSs 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 TRO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the TRO 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 TRSs annotation is found in Section 1.4, Frequency.

TRS 3.0.D 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, TRS 3.0.D is applicable when entering any other specified condition in the Applicability only while operating in MODES 1, 2, 3, or 4. The requirements of TRS 3.0.D 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 Technical Requirements sufficiently define the remedial measures to be taken.

TRS 3.0.E

TRS 3.0.E establishes relaxation from TRS 3.0.A for performing new surveillances or modified surveillances with new acceptance criteria or new intervals. This was modeled after the Facility Operating License Condition AA.2 that was part of the relaxation for conversion to the Improved Technical Specifications. This rule is justified for application in the TRM per revision 1 to NSE-2000-3-070, "TRM."

3.7 PLANT SYSTEMS

3.7.B Appendix R Alternate Safe Shutdown Equipment

TRO 3.7.B The Appendix R Safe Shutdown Functions in Table 3.7.B-1 shall be OPERABLE.

APPLICABILITY: MODE 1, 2, 3 and 4, except for TRO 3.7.B.9, which is MODES 1, 2, 3 and 4 when MSIVs are open.

NOTES

1. TRO 3.0.D is not applicable, except for Related Specifications in Table 3.7.B-1
2. Separate Condition Entry is allowed on each component and Function.
3. See TRM section 3.3.D for instrumentation associated with Appendix R safe shutdown equipment and TRM section 3.8.B for Appendix R Diesel and electrical power scheme.
4. TRO 3.0.C does not apply to Required Actions B.1, E.1 and G.1.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A One or more required Function(s) with one or more required component(s) in table 3.7.B-1 inoperable.	A.1 Enter the Condition(s) referenced in Table 3.7.B-1,	Immediately
	<u>AND</u> A.2 Enter applicable Related Specification referenced in Table 3.7.B-1 as required by that Related Specification.	Immediately
B Enter Condition B as required by Table 3.7.B-1.	B.1 Establish an hourly fire watch in the Fire Watch Area(s) designated in Table 3.7.B-1 for the inoperable Function.	1 hour
C Enter Condition C as required by Table 3.7.B-1.	C.1 Restore required Function(s) to OPERABLE status.	30 days
D Required Action and associated Completion Time of C not met.	D.1 Be in MODE 3,	6 hours
	<u>AND</u> D.2 Be in MODE 5.	36 hours
E Enter Condition E as required by Table 3.7.B-1.	E.1 Verify the availability of at least 8 portable lights with eight-hour capacity,	1 hour
	<u>AND</u> E.2 Restore required Function(s) to OPERABLE status.	30 days
F Enter Condition F as required by Table 3.7.B-1.	F.1 Restore required Function(s) to OPERABLE status.	30 days
G Required Action and associated Completion Time of E.2 or F not met.	G.1 Submit a special report to OSRC according to TRM 5.4.B.	14 days

NOTE

Refer to Table 3.7.B-1 to determine which TRS(s) apply for each Appendix R Function.

SURVEILLANCE

	SURVEILLANCE	FREQUENCY
TRS 3.7.B.1	Press "test button" and assure lamps illuminate.	31 days
TRS 3.7.B.2	DEMONSTRATE pump performance is met by starting each pump and operating for 15 minutes or per IST requirements.	92 days OR Per IST requirements
TRS 3.7.B.3	DEMONSTRATE backup supply of Nitrogen (bottles) is available to cycle ADVs.	92 days
TRS 3.7.B.4	DEMONSTRATE operability of each CR Supplemental A/C unit by running for 15 minutes.	92 days
TRS 3.7.B.5	DEMONSTRATE eight radios are available to support Appendix R safe shutdown activities.	92 days
TRS 3.7.B.6	Run Control Building Exhaust Fans 31, 32, 33, and 34 for a minimum of 15 minutes to DEMONSTRATE proper function.	92 days
TRS 3.7.B.7	Perform a visual inspection of each lighting unit, measure the battery float voltage, and press "test button" and assure lamps illuminate and are properly aimed.	366 days
TRS 3.7.B.8	Perform conductance measurement to meet criterion in Table 3.7.B-2, and perform an eight-hour discharge test or replace emergency battery lights not satisfying the No Discharge Test Criteria in Table 3.7.B-2, and perform an eight-hour discharge test when measurements are taken while the batteries are in an environment above 110 °F. Waiving the criterion for batteries tested while their environment is below 60 °F is allowed if the battery passed the No Discharge Test Criteria six months ago $\pm 25\%$ .	366 days
TRS 3.7.B.9	Perform an eight-hour discharge test on 10% of units that passed the No Discharge Test Criteria in Table 3.7.B-2. An additional sample of 10% of each type that failed shall be tested. Sampling process shall continue until no failures or type is exhausted.	366 days
TRS 3.7.B.10	Perform an eight-hour discharge test on emergency battery light units not subject to conductivity measurement (i.e., units with Ni-Cad batteries, etc.).	24 months
TRS 3.7.B.11	Cycle ADV valves utilizing nitrogen.	24 months

Appendix R Alternate Safe Shutdown Equipment  
3.7.B

	SURVEILLANCE	FREQUENCY
TRS 3.7.B.12	DEMONSTRATE valve closure capability.	24 months
TRS 3.7.B.13	DEMONSTRATE valve opening capability.	24 months
TRS 3.7.B.14	Start each pump and run for 15 minutes powered from its alternate power supply (MCC 312A) and through any applicable transfer switch.	24 months
TRS 3.7.B.15	DEMONSTRATE communication capability between the various local control stations.	24 months
TRS 3.7.B.16	Disable AC power to emergency lighting panel 39 and DEMONSTRATE that emergency lighting in the control room is available.	24 months

Table 3.7.B-1 Appendix R Alternate Safe Shutdown Equipment					
Function	Required Component(s)	Condition	Fire Watch Area	Surveillance	Related Specification
TRO					
TRO 3.7.B.1 Backup Service Water Pump	Backup SWP #38	C	NA	TRS 3.7.B.2	NA
TRO 3.7.B.2 Component Cooling Water Pumps	CCWP #31, CCWP #32, CCWP #33	C	NA	TRS 3.7.B.2 TRS 3.7.B.14 (TRS 3.7.B.14 applies to CCWP #32 only)	ITS 3.7.8
TRO 3.7.B.3 Charging Flow & Isolation Capability (function)	Pumps (flow) CP # 31, CP # 32	C	NA	Pumps TRS 3.7.B.2 TRS 3.7.B.14	TRM 3.1.C.1 TRM 3.1.C.2
	Valves (opening) CH-AOV-212 (CR), CH-227 (locally)			Valves (opening) TRS 3.7.B.13	
	Valve (isolation) CH-AOV-204A (CR), CH-AOV-204B (CR), CH-AOV-200B (CR), CH-LCV-459 (CR), CH-LCV-460 (CR), CH-228 (locally)			Valves (isolation) TRS 3.7.B.12	
TRO 3.7.B.4 Atmospheric Dump Valves (i.e., local control capability)	PCV-1137	C	NA	TRS 3.7.B.3	ITS 3.7.4
	PCV-1134	B & C	Turbine Bldg & Aux Feed Pump Bldg	TRS 3.7.B.11	
TRO 3.7.B.5 Control Room Supplemental A/C	COND/EVAP – - #31, - #32, - - #33, - #34, - #35.	C	NA	TRS 3.7.B.4	NA
TRO 3.7.B.6 Control Room Emergency Lighting	Control Room Emergency Lighting DC Power Feed	E	NA	TRS 3.7.B.16	NA

Table 3.7.B-1 Appendix R Alternate Safe Shutdown Equipment					
Function	Required Component(s)	Condition	Fire Watch Area	Surveillance	Related Specification
TRO 3.7.B.7 Emergency Lighting Units (Appendix R)	Refer to AP-64.1 for a listing.	E	NA	TRS 3.7.B.1 TRS 3.7.B.7 TRS 3.7.B.8 TRS 3.7.B.9 TRS 3.7.B.10	NA
TRO 3.7.B.8 Condenser Make-up Isolation Capability.	CT-7-2, CT-8, CT-12, CT-45, CT-400	C	NA	TRS 3.7.B.12	NA
TRO 3.7.B.9 Secondary Steam Isolation (from Control Room, except MS-9-2 and MS-11-2)	MS-HCV-127-1, MS-HCV-127-2, MS-HCV-127-3, MS-HCV-127-4, MS-MOV-6-1, MS-MOV-6-2, MS-MOV-6-3, MS-MOV-6-4, MS-9-2 (locally), MS-11-2 (locally), PCV-1120, PCV-1121, PCV-1122, PCV-1123, PCV-1124, PCV-1125, PCV-1126, PCV-1127, PCV-1128, PCV-1129, PCV-1130, PCV-1131.	B & C	MSIV(s) vicinity	TRS 3.7.B.12  (from Control room, except MS-9-2 and MS-11-2 locally)	NA
TRO 3.7.B.10 Control Building Ventilation	CB Fan #31 CB Fan #32 CB Fan #33 CB Fan #34 FD-DF-1 (damper) FP-DF-2 (damper) FP-DF-9 (damper) FP-DF-10 (damper) FP-DF-11 (damper) FP-DF-50 (damper) CBL-320 (louver) CBL-319 (louver)	C	NA	TRS 3.7.B.6	NA

Table 3.7.B-1 Appendix R Alternate Safe Shutdown Equipment					
Function	Required Component(s)	Condition	Fire Watch Area	Surveillance	Related Specification
TRO					
TRO 3.7.B.11 Communication Capability	Eight Appendix R Radio Units	F	NA	TRS 3.7.B.5 TRS 3.7.B.15	NA

**Table 3.7.B-2**

**No Discharge Test Criteria & Preventative Maintenance Replacement Criteria**

Note 1: Criterion is not applicable to Ni-Cad Batteries.

Note 2: Criterion is not applicable when measurements are taken while batteries are in an environment below 60°F or above 110°F.

Note 3: \*Criteria values must be adjusted up 1% of mhos for each 1.0°F above a 90°F environment.

Unit Type	Loading	Criteria for No Discharge Test (avg. of batteries)	Preventative Maintenance Replacement Criteria (min. each battery)
B-200	2 – 12 watt heads	150 mhos*	140 mhos*
	4 – 12 watt heads	180 mhos*	140 mhos*
	40 watt head	165 mhos*	140 mhos*
Big Beam in areas other than Electrical Tunnel & Intake Structure	All	350 mhos*	275 mhos*
Big Beam in areas of Electrical Tunnel & Intake Structure	All	480mhos*	275 mhos*

## BASES

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### BACKGROUND

The equipment and systems listed in this Technical Requirement are credited in Appendix R Scenarios and are necessary to meet the requirements of 10CFR50.48 and 10CFR50, Appendix R, Section III.G.

10CFR50 Appendix R requires a licensee to demonstrate the ability to achieve MODE 3 from power operation conditions, bring the plant to MODE 5 conditions and maintain the plant in that condition. Additionally, Appendix R requires that one train of equipment necessary to achieve MODE 3 from either the control room or emergency control station(s) must be maintained free of fire damage by a single fire including an exposure fire.

To support the Appendix R Safe Shutdown Analysis, the plant was divided into distinct analysis zones/areas. These zones/areas are primarily based on Fire Area boundaries with consideration of approved exemptions. These zones/areas are as follows:

CNT-1	Containment Building
PAB-2(1)	Primary Auxiliary Building (15' elevation including RHR pump rooms and corridors)
PAB-2(2)	Primary Auxiliary Building (41' elevation CCW pump area)
PAB-2(3)	Primary Auxiliary Building (55' elevation Charging pump rooms)
PAB-2(4)	Primary Auxiliary Building (55' elevation MCC area)
PAB-2(5)	Primary Auxiliary Building (remaining areas not covered by other analysis areas)
CTL-3	Control Building and Diesel Generator Building (including Control Room, Cable Spreading Room, 480v Switchgear Room, Battery Rooms, Service Water Valve Room and Control Building Fan Room)
ETN-4(1)	Electrical Tunnel (entryway)
ETN-4(2)	Electrical Tunnel (upper electrical tunnel)
ETN-4(3)	Electrical Tunnel (upper electrical penetration area and fan room)
ETN-4(4)	Electrical Tunnel (lower electrical tunnel and lower electrical penetration area)
TBL-5	Turbine Building and Auxiliary Feedwater Pump Building (except Auxiliary Feedwater Pump room)
AFW-6	Auxiliary Feedwater Pump Building (Auxiliary Feedwater Pump room)
Yard-7	External yard areas including Intake Structure, Appendix R Diesel Generator Enclosure, Backup Service Water pump area, and the Condensate Storage Tank area.

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### APPLICABLE SAFETY ANALYSES

Appendix R Safe Shutdown Analysis for IP3, IP3-ANAL-FP –1503, Latest Revision  
NSE 96-3-395FP, "Development of Administrative Procedure AP-64.1 and Evaluation of a Change to Operational Specification 3.2 and 3.5"  
NSE-98-3-091EML, "Changes to Operational Specifications to Reflect a Change in Surveillance Testing of Emergency Lights"

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## TRO

This TRM ensures the OPERABILITY of a subset of the components that are necessary to address the Appendix R fire scenarios in the Appendix R Analysis. This TRM together with Technical Specifications and some other TRM specifications address the OPERABILITY of various components to meet the Appendix R Analysis. Some components credited by the analysis need not be specifically controlled because normal plant operation dictates that their credited function is maintained.

The components listed in Table 3.7.B-1 are credited in the IP3 Appendix R Analysis. These components are required to ensure the ability to achieve MODE 3 from MODE 1 conditions, bring the plant to MODE 5 conditions and maintain the plant in that condition either remotely or from the control room during an Appendix R fire scenario.

In addition, the allowed outage times established by the Technical Specifications or Technical Requirements do not bound the Appendix R requirements, and could result in a required component being out of service indefinitely or during MODEs where this component is required OPERABLE by the Appendix R Analysis.

This condition is outside the design of many of the systems and is not bounded by Technical Specifications or the TRM. Therefore, this TRO establishes actions necessary to ensure OPERABILITY of components credited in the Appendix R Analysis to maintain the components.

Separate condition entries are allowed to clarify the application of the completion time rules. The basis for this allowance is LCO 3.3.4, "Remote Shutdown System", of the Westinghouse Standard Technical Specifications (STS). This STS LCO allows separate entry for each function. The Appendix R Technical Requirements are modeled from the STS.

This Technical Requirement allows changes in operating MODE while relying on Required Actions. Allowance of this exception to TRO 3.0.D is also based on the low probability of an event requiring the use of such components and reasoning that such components can generally be repaired during plant operation without a significant risk of a spurious plant trip. Changes in operating MODE while relying on required actions is allowed, even though those actions may eventually require plant shutdown.

The below identified fire zones/areas are the zones/areas that have a limited set of equipment available and therefore require the controls as specified in this TRO. Other zones/areas not listed (e.g. Yard-7) for the components contained in this TRO and others, were credited but need not be controlled by this TRO.

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### TABLE 3.7.B-1 COMPONENTS

#### Backup Service Water Pump (TRO 3.7.B.1)

Backup Service Water Pump 38 must be OPERABLE to demonstrate the capability to achieve MODE 3 from MODE 1 and maintain the plant in that condition. This pump is powered directly from MCC 312A. Acceptable levels for performance of an OPERABLE Backup Service Water Pump shall be that the pump starts and reaches its required developed head for at least fifteen minutes.

The Backup Service Water Pump 38 provides cooling water to essential/non-essential equipment required to achieve and maintain MODE 5. The IP3 Appendix R compliance strategy credits the use of Backup Service Water Pump 38 for fires in the following zones/areas:

- CTL-3 Control Building and Diesel Generator Building (including Control Room, Cable Spreading Room, 480v Switchgear Room, Battery Rooms, Service Water Valve Room and Control Building Fan Room)
- Yard-7 External yard areas including Intake Structure, Appendix R Diesel Generator Enclosure, Backup Service Water pump area, and the Condensate Storage Tank area.

Component Cooling Water Pumps (TRO 3.7.B.2)

The CCW Pumps must be OPERABLE to provide cooling water to plant equipment necessary to achieve and maintain MODE 5. CCW pump 32 is powered from MCC-312A and is the only CCW pump powered from Appendix R power supplies. Acceptable levels of performance for the determination of an OPERABLE CCW Pump shall be that the pump starts, reaches its required developed head as dictated by IST requirements.

The CCW Pumps provide cooling water to essential/non-essential equipment required to achieve and maintain MODE 5. The IP3 Appendix R Compliance Strategy credits the use of CCW Pump 31 for fire in the following zones/areas:

- PAB-2(1) Primary Auxiliary Building (15' elevation including RHR pump rooms and corridors)
- PAB-2(2) Primary Auxiliary Building (41' elevation CCW pump area)(for a fire affecting 32 & 33 CCWP)

The IP3 Appendix R Compliance Strategy credits the sole use of CCW Pump 32 for fires in the following zones/areas:

- CTL-3 Control Building and Diesel Generator Building (including Control Room, Cable Spreading Room, 480v Switchgear Room, Battery Rooms, Service Water Valve Room and Control Building Fan Room)
- ETN-4(1) Electrical Tunnel (entryway)
- ETN-4(2) Electrical Tunnel (upper electrical tunnel)
- PAB-2(4) Primary Auxiliary Building (55' elevation MCC area)

The IP3 Appendix R compliance strategy credits the sole use of CCW Pump 33 for fires in the following area:

- PAB-2(2) Primary Auxiliary Building (41' elevation CCW pump area)(for a fire affecting 31 CCWP)

Charging Pump Flow & Isolation Capability (function)(TRO 3.7.B.3)

Charging pumps 31 and 32 and the listed valves must be OPERABLE to provide RCS makeup capability and RCP seal cooling whenever the plant is above MODE 5. Charging Pump 31 and 32 are powered from MCC-312A. Acceptable levels for the determination of OPERABLE Charging Pumps 31 and 32 shall be that the pump starts, reaches its required developed head and flow and operate for at least fifteen minutes.

The IP3 Appendix R Compliance Strategy credits the use of charging pumps 31 or 32 for fires in the following zones/areas:

1. Charging Pump 31:
  - ETN-4(4) Electrical Tunnel (lower electrical tunnel and lower electrical penetration area)
  - PAB-2(3) Primary Auxiliary Building (55' elevation Charging pump rooms) (when 32 is affected)
  - PAB-2(4) Primary Auxiliary Building (55' elevation MCC area)
  - ETN-4(1) Electrical Tunnel (entryway)
2. Charging Pump 32:
  - ETN-4(1) Electrical Tunnel (entryway)
  - ETN-4(2) Electrical Tunnel (upper electrical tunnel)
  - PAB-2(3) Primary Auxiliary Building (55' elevation Charging pump rooms) (when 31 is affected)
  - PAB-2(5) Primary Auxiliary Building (remaining areas not covered by other analysis areas)

This Technical Requirement requires the below listed valves to be OPERABLE. The functions necessary for these valves to be declared OPERABLE are as follows:

- CH-AOV-204A and 204B: Isolation function
- CH-228: Isolation function
- CH-227: Open function
- CH-AOV-212: Open function
- CH-AOV-200B: Isolation function
- CH-LCV 459 & 460: Isolation function

#### Atmospheric Dump Valves (TRO 3.7.B.4)

The Steam Generator Atmospheric Dump Valves PCV-1134 and PCV-1137 must be OPERABLE to allow transition to MODE 5 and to maintain steam generator integrity. An acceptable level of performance for the determination of OPERABILITY is the ability to cycle the Atmospheric Dump Valves (ADVs) utilizing the nitrogen backup to the accumulators.

Nitrogen backup for the ADVs consists of a manual pressure regulator feed by either of two sources of nitrogen. One nitrogen source is piped from bottles located on the 15' elevation of the Auxiliary Feedwater Pump Building. The other source is available by installing a jumper from a local nitrogen bottle supplied at the control panel on 43' elevation of the Auxiliary Feedwater Pump Building. Either nitrogen supply must be manually valved in on loss of instrument air.

The Appendix R analysis credits Steam Generator ADVs PCV-1134 and PCV-1137 in a fire scenario to maintain steam generator integrity and to provide a means of heat removal during transition to MODE 5.

The Appendix R Compliance strategy credits the use of PCV-1134 and PCV-1137 for fires in the following zones/areas:

1. Steam Generator Atmospheric Dump Valve PCV-1134:
  - CNT-1 Containment Building

- CTL-3 Control Building and Diesel Generator Building (including Control Room, Cable Spreading Room, 480v Switchgear Room, Battery Rooms, Service Water Valve Room and Control Building Fan Room)
- ETN-4(4) Electrical Tunnel (lower electrical tunnel and lower electrical penetration area)
- TBL-5 Turbine Building and Auxiliary Feedwater Pump Building (except Auxiliary Feedwater Pump room)

2. Steam Generator Atmospheric Dump Valve PCV-1137:

- CNT-1 Containment Building
- ETN-4(1) Electrical Tunnel (entryway)
- ETN-4(2) Electrical Tunnel (upper electrical tunnel)
- ETN-4(3) Electrical Tunnel (upper electrical penetration area and fan room)

In addition, either PCV-1134 or PCV-1137 must be operable for all other areas of the plant not mentioned above.

Control Room Supplemental A/C (TRO 3.7.B.5)

The Supplemental Control Room Air Conditioning (all five units) must be OPERABLE to maintain an acceptable and habitable environment in the control room during Appendix R scenarios. An OPERABLE Supplemental Control Room Air Conditioning System constitutes the ability to start and maintain Control Room temperatures at acceptable levels. This includes the power supply for the A/C units including BM6 480V ac/120 V ac transformer and 208V ac distribution panel DP-CCR/AC.

The Supplemental Control Room Air Conditioning System is credited in various Appendix R fire scenarios to maintain an acceptable and habitable environment in the control room.

The Appendix R Safe Shutdown Analysis credits the use of the Supplemental Control Room Air Conditioning System, during shutdown in the event of a fire in the following zones/areas:

- PAB-2(4) Primary Auxiliary Building (55' elevation MCC area)
- ETN-4(1) Electrical Tunnel (entryway)
- ETN-4(2) Electrical Tunnel (upper electrical tunnel)

Control Room Emergency Lighting (TRO 3.7.B.6)

The control room emergency lighting is required in the event that normal control room lighting is lost during an Appendix R fire scenario. The function of the control room emergency lighting is to ensure that the control room operators have sufficient lighting to monitor critical plant parameters from the control room. OPERABLE Control Room Emergency Lighting constitutes the functioning of emergency lights upon loss of AC power to emergency lighting panel 39.

The control room emergency lighting is credited for various Appendix R fire scenarios.

Emergency Lighting Units (Appendix R) (TRO 3.7.B.7)

The Appendix R compliance strategy requires the use of remote control stations for safe shutdown during a fire in the control room. 10CFR50 Appendix R requires emergency lighting units with at least an 8 hour battery supply to be provided in all areas needed for the operation of safe shutdown equipment and in access and egress routes thereto.

An OPERABLE emergency light constitutes the ability to provide sufficient lighting to accomplish the safe shutdown operations.

The availability of at least 8 portable lights that have an 8 hour capacity must be staged and available in the Safe Shutdown Locker to ensure each member of the shutdown crew will have lighting while performing required tasks in ONOP-FP-1A and ONOP-FP-1B, and access/egress to shutdown stations.

Condenser Makeup Isolation Capability (TRO 3.7.B.8)

Valves CT-7-2, CT-8, CT-12, CT-45, and CT-400 are required in the event that a fire renders valves LCV-1158-1 and LCV-1158-2 inoperable. These valves are required to isolate the Condensate Storage Tank (CST) flow to the condensers and to align CST flow to the suction of the Auxiliary Feedwater Pumps. An acceptable level of performance for the determination of OPERABLE valve status is the ability to isolate.

Valves CT-7-2, CT-8, CT-12, CT-45, and CT-400 are credited in one postulated fire scenario to isolate flow to the condensers from the CST. The Appendix R Safe Shutdown Analysis credits the use of valves CT-7-2, CT-8, CT-12, CT-45, and CT-400 for a postulated fire in the Auxiliary Feedwater Pump Room, area AFW-6.

Secondary Steam Isolation (from control room, except MS-9-2 and MS-11-2)(TRO 3.7.B.9)

The secondary steam isolation valves that are normally aligned during 100% power operation (Appendix R Initiating condition) are credited in Appendix R scenarios where the ability to isolate the main steam lines by utilizing the Main Steam Isolation Valves (MSIVs) is not available. MCC-32 provides control power to reheat valves MS-MOV-6-3 and MS-MOV-6-4. MCC-33 provides control power to reheat valves MS-MOV-6-1 and MS-MOV-6-2.

The secondary steam isolation valves are required in the event that main steam isolation cannot be maintained through the use of MSIVs. This function is required to isolate main steam loss from the steam generators and therefore these valves must be OPERABLE. OPERABLE valves constitute the following:

1. Main Turbine Stop Valves MS-HCV-127-1, -2, -3, -4 able to isolate, AND
2. All steam valves PCV-1120 through PCV-1131 able to isolate, AND
3. All reheat valves MS-MOV-6-1 through MS-MOV-6-4 able to isolate, AND
4. Main Steam to Air Ejectors MS-PCV-1132 Inlet Isolation Valve MS-9-2 able to isolate, AND
5. Main Steam to Hoppers MS-PCV-1133 Inlet Isolation Valve MS-11-2 able to isolate.

If any of these valves are isolated, then OPERABILITY of the isolated valves is not required.

The secondary steam isolation valves covered by this TRO are credited in various Appendix R scenarios to maintain steam generator integrity during MODE 3 and transition to MODE 5 with the MSIVs being open. The Appendix R Compliance Strategy credits the use of secondary steam isolation during a fire in the MSIV area (TBL-5).

Control Building Ventilation (TRO 3.7.B.10)

The Control Building Ventilation System must be OPERABLE to maintain an acceptable environment in the Cable Spreading Room and 480V Switchgear during normal, abnormal, and incident conditions.

An OPERABLE Control Building Ventilation System constitutes the ability to start and maintain the Cable Spreading Room and the 480V Switchgear Room at acceptable temperature levels.

The Control Building Ventilation System covered by this TRO is credited in the Appendix R Safe Shutdown Analysis to maintain an acceptable environment in the Cable Spreading Room and the 480V Switchgear Room. The Appendix R Safe Shutdown Analysis credits the use of the Control Building Ventilation System for all areas except the Control Building and the Diesel Generator Building.

With few exceptions, both exhaust fans of the 480V Switchgear Room Ventilation System are unaffected by a postulated fire. Control Building Fan 34 is credited in the Appendix R Safe Shutdown Analysis to maintain an acceptable environment in the 480V switchgear room in the event Control Building Fan 33 is lost as a result of a postulated fire in the following zones/areas:

- PAB-2(4) Primary Auxiliary Building (55' elevation MCC area)
- ETN-4(1) Electrical Tunnel (entryway)
- ETN-4(2) Electrical Tunnel (upper electrical tunnel)

Control Building Fan 33 is credited in the Appendix R safe shutdown analysis to maintain an acceptable environment in the 480V switchgear room in the event the flowpath through FP-DF-9 is affected as a result of a postulated fire in the following zone/area:

- TBL-5 Turbine Building and Auxiliary Feedwater Pump Building (except Auxiliary Feedwater Pump room)(near the damper)

Cooling of the Cable Spreading Room is accomplished by either the Cable Spreading Room Ventilation System or the Electrical Tunnel Ventilation System. With few exceptions both systems are unaffected by a postulated fire. Control Building Fans 31 and 32 are credited in the Appendix R Safe Shutdown Analysis to maintain an acceptable and habitable environment in the event the Electrical Tunnel Ventilation System is lost as a result of a postulated fire in the following zones/areas:

- PAB-2(4) Primary Auxiliary Building (55' elevation MCC area)
- PAB-2(5) Primary Auxiliary Building (remaining areas not covered by other analysis areas)
- ETN-4(1) Electrical Tunnel (entryway)
- ETN-4(2) Electrical Tunnel (upper electrical tunnel)
- ETN-4(3) Electrical Tunnel (upper electrical penetration area and fan room)
- ETN-4(4) Electrical Tunnel (lower electrical tunnel and lower electrical penetration area)

#### Communication Capability (TRO 3.7.B.11)

The Appendix R compliance strategy at IP3 requires the use of remote control stations for safe shutdown during a fire in the control room. In the event that a fire prevents control of equipment required to achieve and maintain MODE 3, it would become necessary to perform a safe shutdown from outside of the Control Room. Portable radios would be relied upon to provide communications between various members of the operating crew during shutdown. An OPERABLE communication capability constitutes the following:

1. Eight portable radios, AND
2. Chargers for the eight radios.

## ACTIONS

- A. With any of the required functions listed in Table 3.7.B-1 inoperable, the conditions listed for the specific function must be entered and the related specification must also be entered without delay. This allows reasonable measures to be taken without jeopardizing plant safety. This Required Action ensures the appropriate Condition is entered and Required Actions taken as referenced in Table 3.7.B-1.
- B. When components for a function listed in Table 3.7.B-1, become inoperable it is necessary to ensure that the equipment for which these components are credited to replace during an Appendix R scenario are guarded by a fire watch patrol. This helps to ensure that the failure of this equipment due to fire is minimized (e.g. fire watch in MSIV vicinity when Secondary Steam Isolation is inoperable).

A fire watch is not prescribed in this Technical Requirement for those areas that have fire detection or suppression systems governed by TRM 3.7.A. The fire detection or suppression equipment required by TRM 3.7.A provides the protection against fires that would be provided by a fire watch in its absence. Should this fire detection and suppression equipment become inoperable the applicable portion of TRM 3.7.A would prescribe the necessary compensatory measures.

The completion time of 1 hour was selected as a reasonable time in which to post a fire watch patrol. IP3 Administrative procedures control combustibles and ignition sources during power operations. Based on the existence of these controls, the addition of an hourly fire watch patrol is judged to be adequate to ensure the failure of the subject components due to fire is minimized.

- C. This Required Action ensures that the OPERABILITY of the subject equipment is restored in a timely manner. For these components a 30 allowed outage time was established based on Technical Specification 3.3.4, Remote Shutdown. This allowed outage time of 30 days without other compensatory action is acceptable for these components because the plant meets TRM 3.7.A, Fire Protection Systems, or its required compensatory actions.
- D. The functions listed in Table 3.7.B-1 are credited in the IP3 Appendix R Analysis. Appendix R requires that one train of equipment necessary to achieve MODE 3 from either the control room or emergency control station(s) must be maintained free of fire damage by a single fire including an exposure fire.
- When the credited equipment is not restored in a timely manner this Appendix R licensed condition cannot be met by the remaining equipment in table 3.7.B-1 for fires in the zones/areas credited for this equipment as listed in the bases discussion of Table 3.7.B-1.

Therefore, the plant must be placed in MODE 3 within 6 hours and in MODE 5 within 36 hours. The time requirements to place the plant in MODE3 and MODE 5 were chosen to be consistent with Technical Specification 3.0.3 and TRO 3.0.C.

- E. The completion time of 1 hour was selected as a reasonable time frame in which to put compensatory measures in place. The use of portable lighting can support operations personnel to perform the required tasks until such time that the emergency lighting can be made OPERABLE.

The compensatory measures put in place (i.e. availability of at least 8 portable lights with 8-hour capacity) is adequate for extended periods of time. The allowed outage time of 30 days is based on Technical Specification 3.3.4, Remote Shutdown.

- F. The allowed outage time of 30 days is based on Technical Specification 3.3.4, Safe Shutdown. The allowed outage time of 30 days without other compensatory action is acceptable because the plant meets TRO 3.7.A or its required compensatory actions.
- G. The failure of Appendix R Emergency Lighting Units, Control Room Emergency Lighting, or the Appendix R Communication Capability does not directly affect the OPERABILITY of safe shutdown equipment. The use of alternate equipment would provide the same function as the designated equipment. The purpose of this Required Action and associated Completion Time is to ensure that plant management is aware of the inoperable equipment and the subsequent delays in completing repairs to the system. After not restoring the proper equipment in a timely manner the 14 day report to OSRC in accordance with TRM 5.4.B provides the appropriate assessment and review.

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#### SURVEILLANCE REQUIREMENTS

- TRS 3.7.B.1- (Appendix R Emergency Lighting Units) - This test is designed to verify proper operation of the emergency lighting unit by simulating a loss of power and to ensure that no major equipment failure has been induced. This test is consistent with manufacturer's recommendations and guidance identified in EPRI/NMAC Report TR-100249.
- TRS 3.7.B.2 - (Backup Service Water Pump 38, CCW Pumps [31, 32, 33], and Charging Pumps [31,32]) - This test is designed to demonstrate that the subject pumps are capable of providing their rated head and where appropriate using the IST program criteria. The frequency of 92 days is based on similar judgements used in determining the surveillance frequency of other pumps. The test interval of 92 days or where appropriate the IST program frequency is based on the judgment that more frequent testing would not significantly increase the reliability, yet more frequent testing would result in increased wear over a longer period.
- TRS 3.7.B.3 - (S/G ADVs) - This test is to ensure that the motive force utilized to operate the ADVs during an Appendix R event is available.
- TRS 3.7.B.4 - (Control Room Supplemental A/C) - This test is used to ensure the availability and capability of the Control Room Supplemental Air Conditioning System to maintain the Control Room in a safe, habitable condition. The frequency check of 92 days is sufficient to ensure the availability of the system, if required.
- TRS 3.7.B.5 - (Appendix R Radio Units) - The purpose of this test is to verify the availability of at least 8 radios to support Appendix R safe shutdown activities.
- TRS 3.7.B.6 - (Control Building Ventilation) - This test ensures the availability and the capability of the Control Building Ventilation System to maintain the 480V Switchgear Room and Cable Spreading Room at an acceptable condition. The 92-day frequency check is sufficient to ensure the availability of the system, if required.

- TRS 3.7.B.7 - (Appendix R Emergency Lighting Units) – This test is designed to ensure the batteries are maintaining a sufficient charge and through visual inspection of the electrolyte level that the structural integrity of the battery case has been maintained. In addition, this test ensures the lights are properly aimed to illuminate areas and equipment necessary for Appendix R safe shutdown activities. The 366-day frequency is sufficient to ensure OPERABILITY of the equipment. The test is consistent with manufacturer's recommendations and guidance identified in EPRI/NMAC Report TR-100249.
- TRS 3.7.B.8 - (Appendix R Emergency Lighting Units) – This surveillance monitors battery conductance in accordance with Table 3.7.B-2 to determine which batteries are in a condition to exclude them from a discharge test program and which batteries should be scheduled for replacement under the preventative maintenance program. The conductance test method is not applicable to units with Ni-Cad batteries nor to batteries in environments above 110°F.

For temperatures below 60°F, the conductance values will be lower than the same battery at a warmer temperature. This may result in unnecessary action, hence it is allowed to wave the criterion if the last test performed 192 days ago  $\pm 25\%$  passed the No Discharge Test criteria. If batteries are in environments above 90°F, the test and replacement criterion needs to be adjusted up 1% of mhos per each 1°F. Batteries governed under the conductance test program that do not satisfy the No Discharge Test Criteria in Table 3.7.B-2 will be either replaced or subjected to an 8 hour discharge test annually. Batteries in environments above 110°F require discharge testing.

- TRS 3.7.B.9 - (Appendix R Emergency Lighting Units) – Annually, a 10% sample of batteries that pass the conductance No Discharge Test Criteria in Table 3.7.B-2 are subjected to an 8 hour discharge test to demonstrate the adequacy of the conductance test program. An additional 10% of each type that failed shall be tested. The sampling process shall continue until no failures are identified or the type is exhausted. Conductance testing methodology reviewed in NSE-98-3-091EML is based on EPRI/NMAC Report TR-106826.
- TRS 3.7.B.10 - (Appendix R Emergency Lighting Units) – This test is designed to verify that the emergency lighting unit can operate for the design operating time. This test is consistent with the manufacturer's recommendations and guidance identified in EPRI/NMAC Report TR-100249. This test is applicable to EBLs with Ni-Cad or other types of batteries not within the scope of the conductance test program.
- TRS 3.7.B.11 - (S/G ADVs) – This test is to ensure the capability of the subject valves to operate as required utilizing the nitrogen backup. The frequency of 24 months was selected to coincide with refueling outages so that normal plant operations would not be affected.
- TRS 3.7.B.12 - (Charging Flow, Condenser Makeup, Secondary Steam Isolation) – The purpose of this test is to ensure the capability of the subject valves to operate as required. The frequency of 24 months is selected to coincide with refueling outages. The Condenser Makeup 24 month frequency is also based on Technical Specification 3.7.5, Auxiliary Feedwater, that requires other valves in the system to be tested every 24 months. These valves perform an isolation function and as such it is not practical to perform this surveillance during normal plant operations.

- TRS 3.7.B.13 - (Charging flow) - The purpose of this test is to ensure the capability of the listed

Charging System valves to operate as required. The frequency of once per 24 months is selected to coincide with refueling outages. As these valves are normally positioned to support overall CVCS system operation, it is not practical to perform this complete surveillance during normal plant operations.

TRS 3.7.B.14 - (CCW Pump 32, Charging Pumps [31, 32]) – The purpose of this test is to verify the ability to power the subject pumps from the electrical system lineup utilized in the Appendix R Compliance Strategy. The frequency of 24 months was selected to coincide with plant refueling outages in order not to interfere with normal plant operations. The frequency of 24 months is also consistent with testing requirements for auxiliary electrical equipment. Therefore it is judged that more frequent testing would not significantly increase the reliability of the system.  
Note that operation via the local control station of the Charging Pumps is not credited during Appendix R fire scenarios but operation via this control station may be used for this surveillance.

TRS 3.7.B.15 - (Communication Capability) – The purpose of this test is to ensure that radio communications are achievable with the available equipment between the various local control stations. The 24 month frequency was selected to be consistent with refueling outages.

TRS 3.7.B.16 - (Control Room Lighting) – This test is designed to verify the proper operation of the emergency lighting unit by simulating a loss of power and to ensure that no major equipment failure has been induced. The frequency of 24 months was selected to coincide with refueling outages such that normal plant operations would not be affected.

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REFERENCES:

1. FSAR 1.3.1
  2. FSAR 7.2.1
  3. FSAR 9.6.1
  4. FSAR 9.6.2
  5. FSAR 9.9.1
  6. FSAR 10.2.6
  7. NSE 96-3-395, Rev.1, "Development of AP-64.1 and Evaluation of Change to OS 3.2 and 3.5."
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