



FirstEnergy Nuclear Operating Company

76 South Main Street  
Akron, Ohio 44308

Gary R. Leidich  
President and Chief Nuclear Officer

330-384-5770  
Fax: 330-384-5669

January 11, 2007  
L-06-172  
PY-CEI/NRR-2992L

Beaver Valley Power Station, Units 1 and 2  
Docket Nos. 50-334 and 50-412  
LAR 335 and LAR 206

Perry Nuclear Power Plant  
Docket No. 50-440

10 CFR 50.90

United States Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Subject: License Amendment Requests to Add LCO 3.0.8 on the Inoperability of Snubbers  
Using the Consolidated Line Item Improvement Process

Ladies and Gentlemen:

In accordance with the provisions of 10 CFR 50.90, the FirstEnergy Nuclear Operating Company (FENOC) hereby requests Nuclear Regulatory Commission (NRC) review and approval of license amendments to the Technical Specifications (TS) for the Beaver Valley Power Station, (BVPS) Units 1 and 2 and the Perry Nuclear Power Plant (PNPP).

The proposed license amendments modify TS requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8. The proposed license amendments also modify LCO 3.0.1 to incorporate the addition of LCO 3.0.8.

The proposed license amendments are consistent with Nuclear Regulatory Commission (NRC) approved industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-372, Revision 4, "Addition of LCO 3.0.8, Inoperability of Snubbers." The availability of this TS improvement was published in the *Federal Register* on May 4, 2005 as part of the Consolidated Line Item Improvement Process (CLIIP).

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachments A - D to Enclosure 1 provide the TS and TS Bases pages marked up for the BVPS and PNPP, respectively, to show the proposed

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changes. Attachment 1 provides a summary of the regulatory commitment made in this submittal.

Approval of the license amendments is requested by December 2007, with the amendments to be implemented within 120 days following their effective date.

Please note that the proposed changes to the BVPS TS will be implemented subsequent to the implementation of the BVPS amendment to adopt the Improved Technical Specification format, as submitted on February 25, 2005.

If there are any questions or if additional information is required, please contact Mr. Henry L. Hegrat, Supervisor – FENOC Fleet Licensing, at 330-315-6944.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 11, 2007.



Gary R. Leidich

Enclosure:

1. License Amendment Request To Add LCO 3.0.8 On The Inoperability Of Snubbers Using The Consolidated Line Item Improvement Process

Attachment:

1. Commitment List

cc: NRC Perry Project Manager  
NRC Beaver Valley Project Manager  
NRC Perry Resident Inspector  
NRC Beaver Valley Resident Inspector  
NRC Region III  
NRC Region I  
State of Ohio  
State of Pennsylvania

## EVALUATION FOR LICENSE AMENDMENT REQUESTS

Subject: License Amendment Request To Add LCO 3.0.8 On The Inoperability Of Snubbers Using The Consolidated Line Item Improvement Process

### 1. DESCRIPTION

### 2. ASSESSMENT

- 2.1 Applicability of Published Safety Evaluation
- 2.2 Optional Changes and Variations

### 3. REGULATORY SAFETY ANALYSIS

- 3.1 No Significant Hazards Consideration
- 3.2 Verifications and Commitments

### 4. ENVIRONMENTAL CONSIDERATION

### 5. ATTACHMENTS

- A. Proposed Mark-Up of Technical Specification Pages for the Beaver Valley Power Station, Units 1 and 2
- B. Proposed Mark-Up of Technical Specification Pages for the Perry Nuclear Power Plant
- C. Proposed Mark-Up of Technical Specification Bases Pages for the Beaver Valley Power Station, Units 1 and 2 (For Information Only)
- D. Proposed Mark-Up of Technical Specification Bases Pages for the Perry Nuclear Power Plant (For Information Only)

## 1. DESCRIPTION

The proposed License Amendment Requests modify the Technical Specification (TS) requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-372, Revision 4, "Addition of LCO 3.0.8, Inoperability of Snubbers." The availability of this TS improvement was published in the *Federal Register* on May 4, 2005 (70 FR 23252) as part of the Consolidated Line Item Improvement Process (CLIIP).

The proposed amendment also modifies LCO 3.0.1 to incorporate the addition of LCO 3.0.8.

## 2. ASSESSMENT

### 2.1 Applicability of Published Safety Evaluation

The staffs of the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant have reviewed the NRC staff's safety evaluation published in the *Federal Register* on May 4, 2005, as well as the supporting information provided to support TSTF-372, Revision 4. The conclusion of this review is that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant and the amendment is justified for the incorporation of the changes to the plant's TS.

Implementation of the proposed amendment requires operation in accordance with the applicable stipulations outlined in the NRC staff's Notice of Availability, Model Safety Evaluation, Section 3.2.

### 2.2 Optional Changes and Variations

The staff of the Perry Nuclear Power Plant proposes the following three minor variations from the TS changes described in TSTF-372, Revision 4 or the NRC staff's model safety evaluation dated May 4, 2005:

- a. Limiting Condition for Operation (LCO) 3.0.8.a includes a phrase that says, "single train or subsystem supported system." This phrase refers to Boiling Water Reactor (BWR) systems like the Reactor Core Isolation Cooling (RCIC) system or the High Pressure Core Spray (HPCS) system. Since these systems do not have "subsystems," the word "subsystem" should not be included in this phrase. Therefore to avoid confusion, the words "or subsystem" are deleted in this one location of the proposed LCO 3.0.8.a wording for the Perry Nuclear Power Plant.
- b. The term "train" is a Pressurized Water Reactor (PWR) Technical Specification term that is not used in the BWR improved Standard Technical Specifications. In the BWR

improved Standard Technical Specifications, the term “division” is used in lieu of the term “train.” An example of this difference can be seen by comparing the PWR versus BWR definitions of “OPERABLE” versus “OPERABILITY.” Therefore, the word “train” is replaced with the word “division” for the proposed LCO 3.0.8 wording and its Bases for the Perry Nuclear Power Plant.

- c. Section 3.2 of the Model Safety Evaluation presented in NRC’s Notice of Availability of the LCO 3.0.8 CLIIP asserts that since 10 CFR 50.65(a)(4) guidance (NUMARC 93-01, Section 11) does not currently address seismic risk, licensees adopting this change must ensure that the proposed LCO 3.0.8 is considered in conjunction with other plant maintenance activities and integrated into the existing 10 CFR 50.65(a)(4) process. Therefore, it is appropriate to replace the word “should” with the word “must” within this statement in Section 3.2, “Verifications and Commitments,” of this letter in addition to the applicable proposed TS Bases wording for the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant.

### 3. REGULATORY SAFETY ANALYSIS

#### 3.1 No Significant Hazards Consideration

The staffs of the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant have reviewed the proposed No Significant Hazards Consideration Determination (NSHCD) published in the *Federal Register* on November 24, 2004 (69 FR 68420) as part of the CLIIP. This review concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

#### 3.2 Verifications And Commitments

As discussed in the model Safety Evaluation published in the *Federal Register* on May 4, 2005 (70 FR 23252) for this TS improvement, plant-specific verifications were performed as follows:

By the implementation date of the applicable licensee amendment, the staffs of the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant will establish TS Bases for LCO 3.0.8, which will provide guidance and details on how to implement the new requirements of LCO 3.0.8. The TS Bases will specify that the implementation of LCO 3.0.8 will require plant risk to be managed and assessed. The Bases will also state that while the industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk, LCO 3.0.8 must be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

The Perry Nuclear Power Plant currently has a Bases Control Program consistent with Section 5.5 of the BWR/6 Standard Technical Specifications. The Beaver Valley Power Station also has a Bases Control Program and will continue to incorporate a Bases Control Program as part of their implementation of the Improved TS submittal dated February 25, 2005.

The regulatory commitment differs from the Model Application to more appropriately reflect the variations that are proposed from the TS changes described in TSTF-372, Revision 4 or the NRC staff's model safety evaluation.

#### 4. ENVIRONMENTAL CONSIDERATION

The staffs of the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant have reviewed the environmental consideration included in the model Safety Evaluation published on May 4, 2005 as part of the CLIP. The NRC staff's findings presented in that evaluation are applicable to the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant and the evaluation is hereby incorporated by reference for this application.

#### 5. ATTACHMENTS

- A. Proposed Mark-Up of Technical Specification Pages for the Beaver Valley Power Station, Units 1 and 2
- B. Proposed Mark-Up of Technical Specification Pages for the Perry Nuclear Power Plant
- C. Proposed Mark-Up of Technical Specification Bases Pages for the Beaver Valley Power Station, Units 1 and 2 (For Information Only)
- D. Proposed Mark-Up of Technical Specification Bases Pages for the Perry Nuclear Power Plant (For Information Only)

**Proposed Mark-Up of Technical Specification Pages  
for the  
Beaver Valley Power Station (BVPS)  
Units 1 and 2**

Note: Proposed changes to the BVPS Technical Specifications are noted on Improved Technical Specification pages, since NRC approval of the BVPS amendment to adopt the Improved Technical Specification format, submitted on February 25, 2005, is anticipated prior to issuance of this proposed amendment.

### 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, and LCO 3.0.7, and LCO 3.0.8.

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

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

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

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

Exceptions to this Specification are stated in the individual Specifications.

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

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

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LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or

### 3.0 LCO Applicability

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#### LCO 3.0.4 (continued)

- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

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**LCO 3.0.5** Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

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**LCO 3.0.6** When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.11, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

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**LCO 3.0.7** Test Exception LCOs 3.1.9 and 3.4.19 allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

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**Insert 1  
( LCO 3.0.8 )** →

**INSERT 1 for Beaver Valley Power Station, Units 1 and 2**

- LCO 3.0.8      When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
  - b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

**Proposed Mark-Up of Technical Specification Pages  
for the  
Perry Nuclear Power Plant**

### 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, and LCO 3.0.7, and LCO 3.0.8.

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

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

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

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

Exceptions to this Specification are stated in the individual Specifications.

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

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

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LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;

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**NO CHANGE TO THIS PAGE – FOR INFORMATION ONLY**

LCO Applicability  
3.0

3.0 LCO APPLICABILITY

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LCO 3.0.4  
(continued)

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

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS, or that are part of a shutdown of the unit.

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LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

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LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

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3.0 LCO APPLICABILITY (continued)

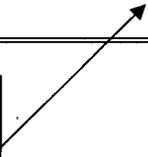
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LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

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Insert 2  
( LCO 3.0.8 )



## **INSERT 2 for Perry Nuclear Power Plant**

- LCO 3.0.8      When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one division or subsystem of a multiple division or subsystem supported system or are associated with a single division supported system and are able to perform their associated support function within 72 hours; or
  - b. the snubbers not able to perform their associated support function(s) are associated with more than one division or subsystem of a multiple division or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

**Proposed Mark-Up of Technical Specification Bases Pages  
for the  
Beaver Valley Power Station  
Units 1 and 2**

**( *For Information Only* )**

Note: Proposed changes to the BVPS Technical Specifications Bases are noted on Improved Technical Specification Bases pages, since NRC approval of the BVPS amendment to adopt the Improved Technical Specification format, submitted on February 25, 2005, is anticipated prior to issuance of this proposed amendment.

### B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY BASES

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LCOs LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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LCO 3.0.1 LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

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LCO 3.0.2 LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, 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 an LCO are not met. This Specification establishes that:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification and
- b. Completion of the Required Actions is not required when an LCO 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 LCO 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 Specification 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 an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

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BASES

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LCO 3.0.6 (continued)

address the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the support system.

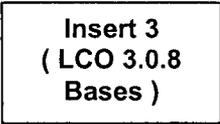
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LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs 3.1.9 and 3.4.19 allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Test Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Test Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Test Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Test Exception LCO, the requirements of the Test Exception LCO shall be followed.

**Insert 3  
( LCO 3.0.8  
Bases )**



### **INSERT 3 for Beaver Valley Power Station, Units 1 and 2**

**LCO 3.0.8** LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 must be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

**Proposed Mark-Up of Technical Specification Bases Pages  
for the  
Perry Nuclear Power Plant**  
  
**( *For Information Only* )**

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES	
LCOs	LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, 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 an LCO are not met. This Specification establishes that:</p> <ol style="list-style-type: none"> <li>a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and</li> <li>b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.</li> </ol> <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO 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 Specification 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</p>

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BASES

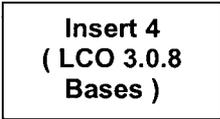
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LCO 3.0.7  
(continued)

allow specified TS requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.

**Insert 4  
( LCO 3.0.8  
Bases )**



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## INSERT 4 for Perry Nuclear Power Plant

LCO 3.0.8 LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

If the allowed time expires and the snubber(s) are unable to perform their associated support function(s), the affected supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single division or subsystem of a multiple division or subsystem supported system or to a single division supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant division of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one division or subsystem of a multiple division or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 must be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected division or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

**COMMITMENT LIST**

The following list identifies those actions committed to by the FirstEnergy Nuclear Operating Company (FENOC) for the Beaver Valley Nuclear Power Station, Units 1 and 2 and the Perry Nuclear Power Plant in this document. Any other actions discussed in the submittal represent intended or planned actions. They are described only for information and are not regulatory commitments. If there are any questions or if additional information is required, please contact Mr. Henry L. Hegrat, Supervisor - FENOC Fleet Licensing, at (330) 315-6944.

<b>Commitment</b>	<b>Due Date</b>
1. The staffs of the Beaver Valley Power Station, Units 1 and 2 and the Perry Nuclear Power Plant will establish TS Bases for LCO 3.0.8, which will provide guidance and details on how to implement the new requirements of LCO 3.0.8.	1. The implementation date of the applicable licensee amendment.