

ATTACHMENT 1

VOLUME 5

DAVIS-BESSE IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

ITS SECTION 3.0 LCO and SR APPLICABILITY

Revision 0

LIST OF ATTACHMENTS

- 1. ITS Section 3.0**

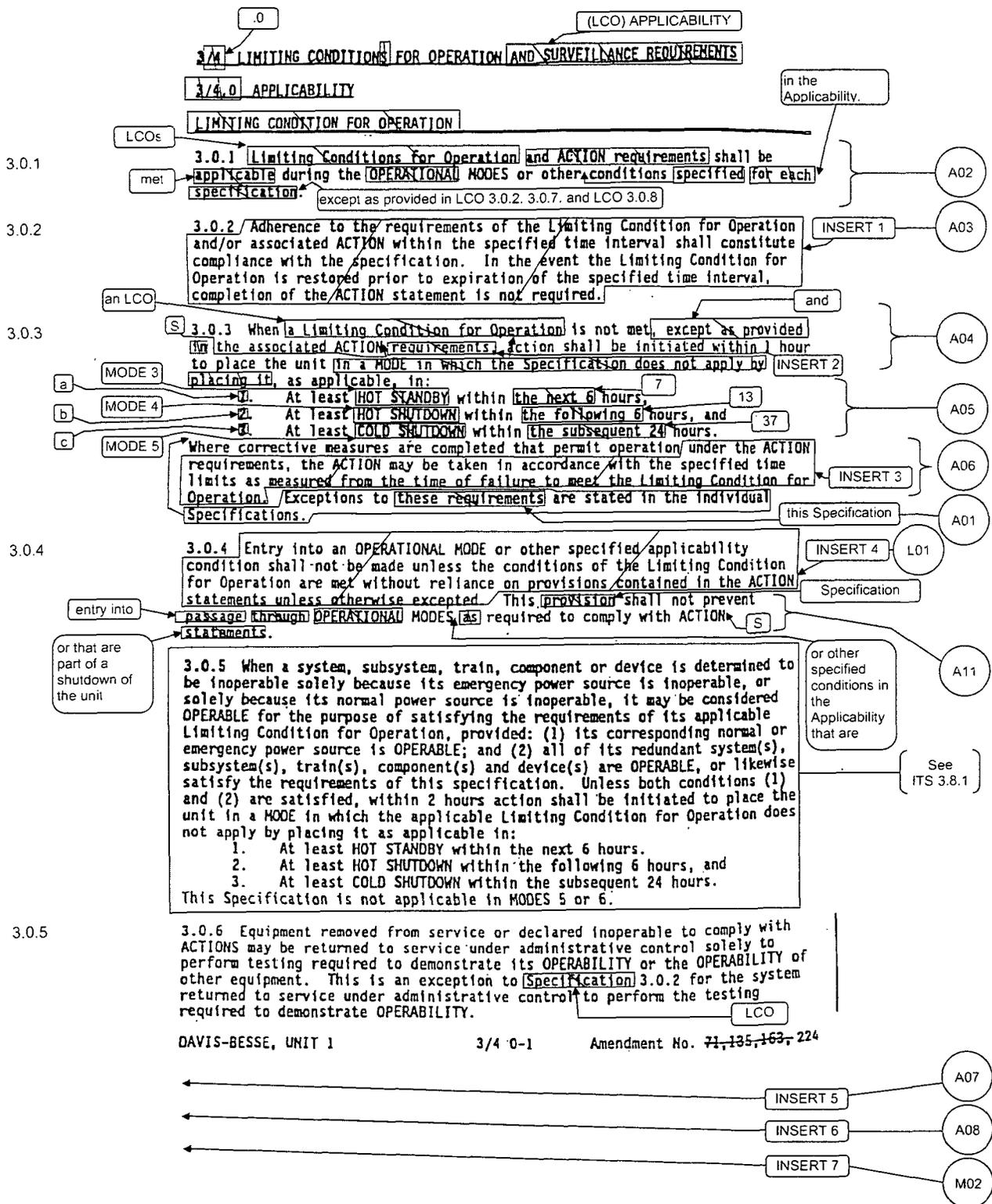
ATTACHMENT 1

ITS Section 3.0, LCO and SR Applicability

**Current Technical Specification (CTS) Markup
and Discussion of Changes (DOCs)**

A01

ITS



A03

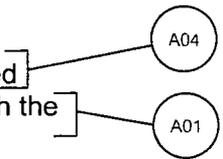
INSERT 1

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If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

INSERT 2

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.



A06

INSERT 3

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.

L01

INSERT 4

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

A07

INSERT 5

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 5.5.14, "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.

A08

INSERT 6

LCO 3.0.7 Test Exception LCOs 3.1.8 and 3.1.9 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.

M02

INSERT 7

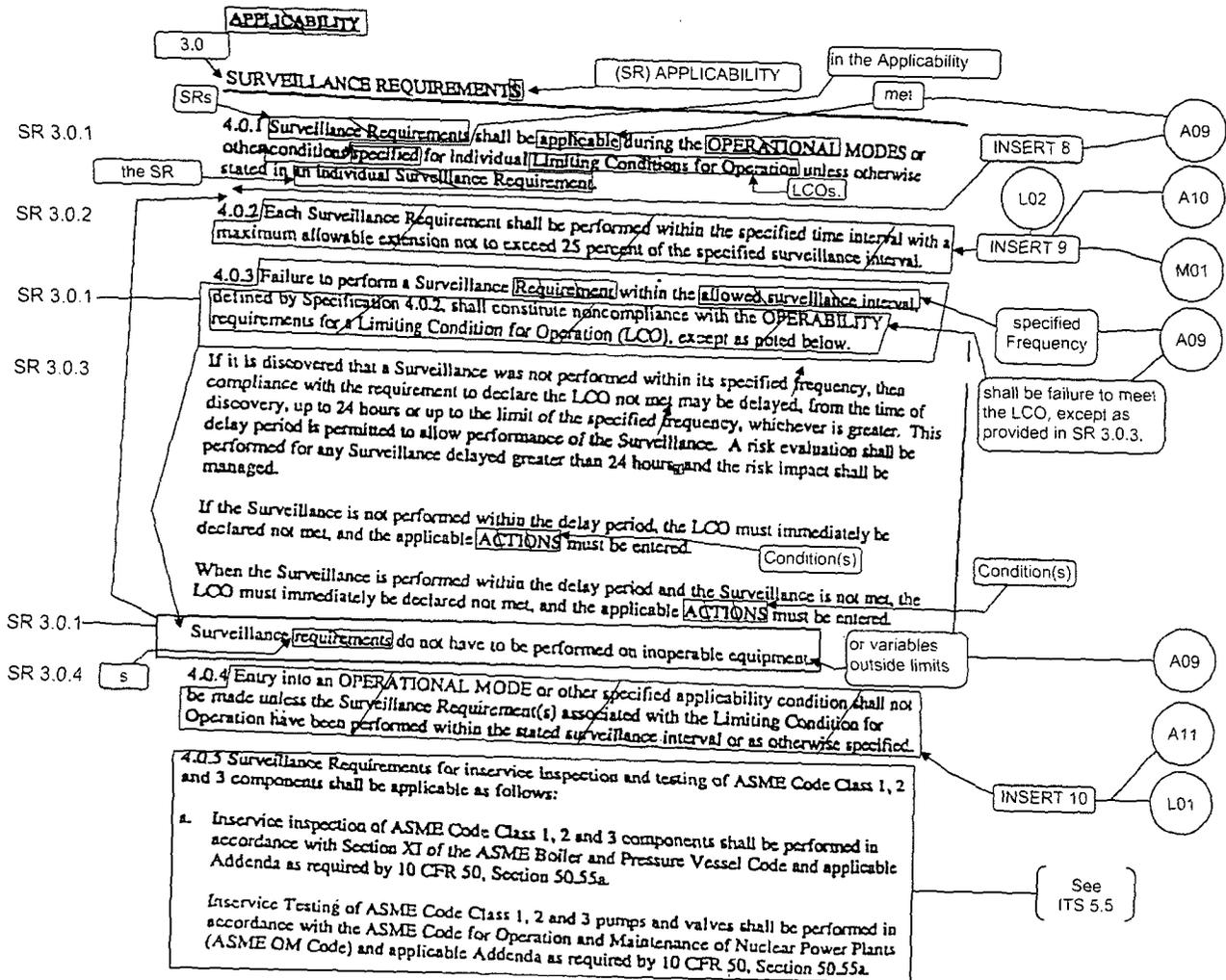
LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- 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.

ITS

A01



A09

INSERT 8

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

INSERT 9

SR 3.0.2

The specified Frequency for each SR 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.

A10

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

M01

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

L02

Exceptions to this Specification are stated in the individual Specifications.

A10

INSERT 10

SR 3.0.4

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

L01

This provision shall not prevent entry 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.

A11

APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda and the ASME OM Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and the ASME OM Code and applicable Addenda terminology for inservice inspection and testing criteria	Required frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Semi-quarterly	At least once per 46 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

(See ITS 5.5)

c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.

d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

e. Nothing in the ASME Boiler and Pressure Vessel Code or the ASME OM Code shall be construed to supersede the requirements of any Technical Specification.

ITS

LCO
3.0.8

PLANT SYSTEMS

3/4.7.7 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.7 All safety-related snubbers shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

a. With one or more snubbers inoperable: 1. within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status, or 2. verify system operability with the snubber(s) inoperable by engineering evaluation within 72 hours; or 3. declare the supported subsystem inoperable and follow the appropriate ACTION statement for that system.

and, for snubbers which have failed either the visual or functional test:

b. Perform an engineering evaluation within 90 days to determine if any safety-related system or component has been adversely affected by the inoperability of the snubber and if the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.¹ The provisions of Technical Specification 3.0.4 are not applicable for the component or system.

SURVEILLANCE REQUIREMENTS

4.7.7 Each snubber² shall be demonstrated OPERABLE by the requirements of the following surveillance programs and pursuant to requirements of Specification 4.0.5.

4.7.7.1 Visual Inspection Program

¹Engineering evaluation is not required when a snubber is removed for surveillance testing provided it is returned to OPERABLE status within the requirements of ACTION statement a.

²Safety-related snubbers are listed in the latest revision of applicable surveillance test procedure(s). Snubbers may be added to, or removed from, safety-related systems and their assigned groups without a License Amendment.

{ See
CTS 3/4.7.7 }

M02

{ See
CTS 3/4.7.7 }

{ See
CTS 3/4.7.7 }

{ See
CTS 3/4.7.7 }

**DISCUSSION OF CHANGES
ITS SECTION 3.0, LCO AND SR APPLICABILITY**

ADMINISTRATIVE CHANGES

A01 In the conversion of the Davis-Besse Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1430, Rev. 3.1, "Standard Technical Specifications-Babcock and Wilcox Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A02 CTS 3.0.1 states, "Limiting Conditions for Operation and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification." ITS LCO 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8." This results in several changes to the CTS.

- Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "Limiting Conditions for Operation" is changed to "LCOs" and "OPERATIONAL MODES or other conditions specified" is changed to "MODES or other specified conditions" to be consistent with the ITS definition of MODE and the terminology used in the ITS.

These changes are acceptable because they result in no change in the intent or application of the Technical Specification, but merely reflect editorial preferences used in the ITS.

- The phrase ". . . ACTION requirements shall be applicable during the OPERATIONAL MODES . . ." is moved from CTS 3.0.1 to ITS LCO 3.0.2 which states that upon discovery or a failure to meet an LCO, the Required Actions of the associated Conditions shall be met.

The change is acceptable because moving this information within the Technical Specifications results in no change in the intent or application of ACTIONS.

- The phrase "shall be applicable" is replaced in ITS LCO 3.0.1 with the phrase "shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an LCO being met (i.e., being in compliance with the requirements of the LCO), versus the LCO being applicable or required (i.e., the requirements in the LCO apply).

This change is acceptable because it is an editorial change that does not change the intent of the requirements.

- The phrase "except as provided in LCO 3.0.2, 3.0.7, and 3.0.8" is added in ITS LCO 3.0.1. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. LCO 3.0.7 describes Test

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ITS SECTION 3.0, LCO AND SR APPLICABILITY**

Exception LCOs, which are exceptions to other LCOs. LCO 3.0.8 addresses snubber inoperabilities, which is also an exception to other LCOs. LCO 3.0.2 modifies ITS LCO 3.0.1 since the ACTION requirements discussion that is in CTS 3.0.1 has been moved to ITS LCO 3.0.2, as described above.

This change is acceptable because adding the exception for LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8 prevents a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Technical Specifications.

These changes are designated administrative because they are editorial and result in no technical changes to the Technical Specifications.

A03 CTS 3.0.2 states, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." ITS LCO 3.0.2 states "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." This results in several changes to the CTS.

- The first sentence in CTS 3.0.2 states, in part, "Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION . . . shall constitute compliance with the specification." This requirement is divided into portions of ITS LCO 3.0.1, "LCOs shall be met" and ITS LCO 3.0.2, "Upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met."

This change is acceptable because the intent of the CTS requirement is preserved, but the aspects of LCO compliance and the performance of ACTIONS when the LCO is not met are separated.

- The phrase "except as provided in LCO 3.0.5" has been added to CTS 3.0.2 since ITS LCO 3.0.5 (LCO 3.0.6) already includes the allowance (CTS 3.0.6 states that the allowance is an exception to Specification 3.0.2).

This change is acceptable because it results in no change in the intent or application of the Technical Specification, but merely reflects an editorial preference.

- CTS 3.0.2 is revised to include an exception for ITS LCO 3.0.6. LCO 3.0.6 is a new allowance that takes exception to the ITS LCO 3.0.2 requirement to take the Required Actions when the associated LCO is not

**DISCUSSION OF CHANGES
ITS SECTION 3.0, LCO AND SR APPLICABILITY**

met. This exception is included in LCO 3.0.2 to avoid conflicts between the applicability requirements.

This change is acceptable because it includes a reference to a new item in the ITS and results in no change to the CTS. Changes resulting from the incorporation of LCO 3.0.6 are discussed in Discussion of Change (DOC) A07.

- The second sentence of CTS LCO 3.0.2 states, "In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required." The sentence is replaced in ITS LCO 3.0.2 with "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."

This change is acceptable because, while worded differently, both the CTS and ITS state that ACTIONS do not have to be completed once the LCO is met or is no longer applicable. ITS LCO 3.0.2 also adds the phrase, "unless otherwise stated." There are some ITS ACTIONS that must be completed, even if the LCO is met or is no longer applicable. This change is acceptable because it reflects a new feature in the ITS which did not exist in the CTS. The technical aspects of these changes are discussed in the appropriate ITS sections.

These changes are designated as administrative because they are editorial and do not result in technical changes to the Technical Specifications.

A04 CTS LCO 3.0.3 is applicable "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements." ITS LCO 3.0.3 expands those applicability requirements so that the requirement is applicable "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." This changes the CTS to add two new applicability conditions.

- ITS LCO 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

- ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The CTS and the ITS contain such requirements. Any technical changes related to directing LCO 3.0.3 entry in an ACTION will be discussed in the affected Technical Specifications.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

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These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.

- A05 CTS 3.0.3, in part, states "action shall be initiated within 1 hour to place the unit in a MODE in which the Specification does not apply." CTS 3.0.3 also states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS 3.0.3 states "Actions shall be initiated in 1 hour to place the unit, as applicable, in MODE 3 within 7 hours, MODE 4 within 13 hours, and MODE 5 within 37 hours." ITS 3.0.3 states the time limits (Completion Times) are from the time the condition was entered. In addition, the MODE titles used in CTS 3.0.3 are replaced with the corresponding MODE numbers in ITS LCO 3.0.3. The stated times in CTS 3.0.3 and ITS LCO 3.0.3 are listed below:

<u>Mode</u>	<u>Title</u>	<u>CTS Time to Enter Mode</u>	<u>ITS Time to Enter Mode</u>
--	(Current Mode)	1 hour to begin action	1 hour to begin action
3	Hot Standby	within the next 6 hours	7 hours
4	Hot Shutdown	within the following 6 hours	13 hours
5	Cold Shutdown	within the subsequent 24 hours	37 hours

These changes are acceptable because the ITS times are the sum of the CTS times (e.g., the ITS Completion Time of 37 hours to enter MODE 5 is the same as the sum of the CTS allowance of 1 hour, 6 hours, 6 hours, and 24 hours.) This changes the CTS presentation only, and the time allowed to enter each MODE is unchanged. Using MODE numbers instead of the corresponding MODE titles is an editorial preference that results in no change to the requirements in the Technical Specifications. In addition, the CTS 3.0.3 statement "action shall be initiated within 1 hour to place the unit in a MODE in which the Specification does not apply" has been editorially reworded in ITS LCO 3.0.3 to "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..." These changes are acceptable because they result in no change in the intent or application of the Technical Specification, but merely reflect editorial preferences used in the ITS.

These changes are designated as administrative as they implement the editorial conventions used in the ITS without resulting in technical changes to the Technical Specifications.

- A06 CTS 3.0.3 states "Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation." ITS LCO 3.0.3 states "Where corrective measures are completed that permit operation in accordance with the

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ITS SECTION 3.0, LCO AND SR APPLICABILITY**

LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is applicable in MODES 1, 2, 3, and 4."

This change is acceptable because the changes to CTS 3.0.3 are editorial. Both the CTS and ITS state that LCO 3.0.3 can be exited if the LCO which led to the entry into LCO 3.0.3 is met, or if one of the ACTIONS of that LCO is applicable. The CTS requirement also specifies that the time to complete the ACTIONS in the LCO is based on the initial failure to meet the LCO. Reentering the LCO after exiting LCO 3.0.3 does not reset the ACTION statement time requirements. This information is not explicitly stated in ITS LCO 3.0.3 but is true under the multiple condition entry concept of the ITS. In addition, the sentence "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4" is added to ITS LCO 3.0.3. CTS 3.0.3 and ITS LCO 3.0.3 require the unit to be placed only as low as COLD SHUTDOWN (MODE 5). Once the unit is in MODE 5, there are no further requirements. Thus, CTS 3.0.3 and ITS LCO 3.0.3 are effectively only applicable in MODES 1, 2, 3, and 4, and the addition of the sentence merely reflects editorial preferences used in the ITS.

These changes are designated as administrative because there is no change in the intent or application of the CTS 3.0.3 requirements.

A07 ITS LCO 3.0.6 is added to the CTS to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). LCO 3.0.6 states "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 5.5.14, "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." In the CTS, based on the intent and interpretation provided by the NRC over the years, there has been an ambiguous approach to the combined support/supported inoperability. Some of this history is summarized below:

- Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination) would indicate an intent/interpretation consistent with the proposed LCO 3.0.6, without the necessity of also requiring additional ACTIONS. That is, only the inoperable support system ACTIONS need be taken.
- Guidance provided by the NRC in their April 10, 1980, letter to all Licensees, regarding the definition of OPERABILITY and its impact as a

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support system on the remainder of the CTS, would indicate a similar philosophy of not taking ACTIONS for the inoperable supported equipment. However, in this case, additional actions (similar to the proposed Safety Function Determination Program actions) were addressed and required.

- Generic Letter 91-18 and a plain-English reading of the CTS provide an interpretation that inoperability, even as a result of a Technical Specification support system inoperability, requires all associated ACTIONS to be taken.
- Certain CTS contain ACTIONS such as "Declare the {supported system} inoperable and take the ACTIONS of {its Specification}." In many cases, the supported system would likely already be considered inoperable. The implication of this presentation is that the ACTIONS of the inoperable supported system would not have been taken without the specific direction to do so.

Considering the history of misunderstandings in this area, the Babcock and Wilcox ISTS, NUREG-1430, Rev. 3, was developed with Industry input and approval of the NRC to include LCO 3.0.6 and a new program, Specification 5.5.14, "Safety Function Determination Program (SFDP)." This change is acceptable since its function is to clarify existing ambiguities and to maintain actions within the realm of previous interpretations. This change is designated as administrative because it does not technically change the Technical Specifications.

- A08 ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states "Test Exception LCOs 3.1.8 and 3.1.9 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."

This change is acceptable because the CTS contain test exception specifications that allow certain LCOs to not be met for the purpose of special tests and operations. However, the CTS does not contain the equivalent of ITS LCO 3.0.7. As a result, there could be confusion regarding which LCOs are applicable during special tests. LCO 3.0.7 was crafted to avoid that possible confusion. LCO 3.0.7 is consistent with the use and application of CTS test exception Specifications and does not provide any new restriction or allowance. This change is designated as administrative because it does not technically change the Technical Specifications.

- A09 CTS 4.0.1 states, "Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance

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Requirement." CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation (LCO) except as noted below." CTS 4.0.3 also states, "Surveillance requirements do not have to be performed on inoperable equipment." These allowances have been included in ITS LCO 3.0.1. ITS LCO 3.0.1 states, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes to the CTS are:

- The phrase "shall be applicable" is replaced in ITS SR 3.0.1 with the phrase "shall be met." This change is made to be consistent with the ITS terminology and to clarify the concept of an SR being met (i.e., being in compliance with the requirements of the SR), versus the SR being applicable or required (i.e., the requirements in the SR apply).

This change is acceptable because it is an editorial change that does not change the intent of the requirements.

- The second sentence of ITS SR 3.0.1 includes the statement, "Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO." This changes the CTS by adding the clarification "whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance."

This change is acceptable because it is consistent with the current use and application of the Technical Specifications.

- The first sentence in CTS 4.0.3 states, "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute non compliance with the OPERABILITY requirements for a Limiting Condition for Operation (LCO), except as noted below." The last sentence in CTS 4.0.3 states, "Surveillance requirements do not have to be performed on inoperable equipment." The third sentence in ITS SR 3.0.1 states, "Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3." The last statement in ITS SR 3.0.1 states, "Surveillances do not have to be performed on inoperable equipment or variables outside specified limits." The changes the CTS by moving the first sentence of CTS 4.0.3 to the third sentence of SR 3.0.1 and by moving the last sentence of CTS 4.0.3 to the fourth sentence of SR 3.0.1 and adds the term "or variables outside limits."

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Proposed SR 3.0.1 is constructed to more completely present the relationship between Surveillance Requirements and meeting the requirements of the LCO. In this regard, the concepts within CTS 4.0.3 are combined with CTS 4.0.1 into proposed SR 3.0.1. All LCOs do not deal exclusively with equipment OPERABILITY. Therefore the clarifying phrase, "or variables outside specified limits" is acceptable.

These changes are acceptable and designated administrative because they move and clarify information within the Technical Specifications.

A10 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR 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 Specification are stated in the individual Specifications." This results in several changes to the CTS.

- ITS SR 3.0.2 adds to the CTS "For Frequencies specified as 'once,' the above interval extension does not apply." This is described in DOC M01.
- ITS SR 3.0.2 adds to the CTS "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L02.
- CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met.

The change is acceptable since it does not change the intent of the requirements.

- ITS SR 3.0.2 is more specific regarding the start of the Frequency by stating, "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications.

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This change is acceptable because the ITS presentation has the same intent as the CTS requirement.

- ITS SR 3.0.2 adds to the CTS "Exceptions to this Specification are stated in the individual Specifications."

This change is acceptable because it reflects practices used in the ITS that are not used in the CTS. Any changes to a Technical Specification, by inclusion of such an exception, will be addressed in the affected Technical Specification.

The changes except as discussed in DOC M01 and DOC L02 are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.

- A11 CTS 3.0.4, in part, states "This provision shall not prevent passage through OPERATIONAL MODES as required to comply with ACTION statements." CTS 4.0.4 does not include a similar statement. ITS LCO 3.0.4 and SR 3.0.4, in part, state "This Specification shall not prevent entry 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." This changes the CTS by revising the phrase in CTS 3.0.4 and adding the phrase to CTS 4.0.4.

This change is acceptable because the statements in ITS LCO 3.0.4 and ITS SR 3.0.4 are equivalent to the statement in the CTS. Both are stating that LCO 3.0.4 or SR 3.0.4 shall not prevent a unit shutdown required by the Technical Specifications. The ITS wording recognizes that there are conditions in the Applicability that are not MODES, such as "During movement of irradiated fuel within containment." This change is designated as administrative as there is no change in the intent of the CTS and no additional flexibility is granted.

MORE RESTRICTIVE CHANGES

- M01 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR 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 Specification are stated in the individual Specifications." This changes the CTS by adding, "For Frequencies specified as 'once,' the above interval extension does not apply." The remaining changes to CTS 4.0.2 are discussed in DOC A10 and DOC L02.

The purpose of the 1.25 extension allowance to Surveillance Frequencies is to allow for flexibility in scheduling tests. This change is acceptable because Frequencies specified as "once" are typically condition-based Surveillances in

**DISCUSSION OF CHANGES
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which the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Frequency without extension in order to avoid operation in unacceptable conditions. This change is designated as more restrictive because an allowance to extend Frequencies by 25% is eliminated from some Surveillances.

- M02 CTS 3.7.7 Action a provides the actions for inoperable snubbers, and requires one of the following (1, 2, or 3) within 72 hours when one or more snubbers are inoperable: 1) replace or restore the inoperable snubber(s) to OPERABLE status; 2) verify system operability with the snubber(s) inoperable by engineering evaluation; or 3) declare the supported system inoperable and follow the appropriate ACTION statement for that system. In the ITS, the actions for inoperable snubbers are incorporated into ITS 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 either: 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 (i.e., 12 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected system LCO(s) shall be declared not met. This changes the CTS by requiring the risk associated with inoperable snubbers to be assessed and managed and requires the snubbers to be restored to OPERABLE status in all cases, and in certain cases within a more restrictive Completion Time.

The purpose of CTS 3.7.7 Action a is to provide a short time (72 hours) prior to requiring the affected systems to be declared inoperable, to either restore or replace inoperable snubbers or to perform an engineering analyses to assess whether the inoperable snubbers affect the OPERABILITY of the supported components. ITS LCO 3.0.8 requires the risk associated with inoperable required snubbers to be assessed and managed in all instances of snubber inoperability. ITS LCO 3.0.8 also requires all "required" inoperable snubbers to be restored to OPERABLE status within the specified Completion Times. It does not provide an explicit option to perform an engineering evaluation to assess whether the as-found condition of the snubber had no adverse effect on supported components. However, the wording of ITS LCO 3.0.8 (i.e., one or more "required" snubbers) continues to allow this evaluation to be performed. ITS LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single subsystem of a multiple subsystem supported system or to a single subsystem supported system. ITS LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable, provided only a single subsystem is affected. This 72 hour time is consistent with the CTS. However, ITS 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 subsystem of a multiple subsystem supported system, and allows 12 hours to restore the snubber(s) before declaring the

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supported system inoperable. This 12 hour time is more restrictive than the CTS. The 12 hour Completion Time is acceptable 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. Furthermore, ITS LCO 3.0.8 requires that risk be assessed and managed. This risk assessment is not required in the CTS. The Bases for ITS LCO 3.0.8 provides guidance on how the risk must be assessed. 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 ITS LCO 3.0.8 should 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. This change is designated as more restrictive because inoperable snubbers must be restored to OPERABLE status under certain conditions within a more restrictive Completion Time and the risk associated with inoperable snubbers must always be assessed and managed.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

- L01 CTS 3.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability conditions shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted." CTS 4.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirements(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified." ITS LCO 3.0.4 states "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 c. When an allowance is stated in the individual value, parameter, or other

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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." ITS SR 3.0.4 states, "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This changes the CTS by providing allowances for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. The change is acceptable because LCO 3.0.4 provides the appropriate guidance to enter the Applicability when an LCO is not met. LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c. LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. 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. LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the

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ITS SECTION 3.0, LCO AND SR APPLICABILITY**

proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability. LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. These systems and components are the ECCS Low Pressure Injection Subsystem, the Auxiliary Feedwater System and Motor Driven Feedwater Pump train, and the emergency diesel generators (ITS 3.5.3, ITS 3.7.5, and ITS 3.8.1, respectively). LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less

**DISCUSSION OF CHANGES
ITS SECTION 3.0, LCO AND SR APPLICABILITY**

restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

- L02 CTS 4.0.2 states, "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR 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 Specification are stated in the individual Specifications." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A10 and DOC M01.

This change is acceptable because the 25 percent Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions that must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Required Actions.

**Improved Standard Technical Specifications (ISTS) Markup
and Justification for Deviations (JFDs)**

CTS

3/4 **3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY**

3.0.1 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, LCO 3.0.7, and LCO 3.0.8.

3.0.2 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.

3.0.3 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.
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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.

3.0.4 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



1

CTS 3.0 LCO Applicability

3.0.4 LCO 3.0.4 (continued)

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

entry to

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.

3

3.0.6 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.

DOC A07 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 5.5.14, "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.

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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.

DOC A08 LCO 3.0.7

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Test Exception LCOs ~~[[3.1.9, 3.1.10, 3.1.11]]~~ 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.

3.1.9

2

CTS3.0 LCO Applicability

3.7.7
Action a

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.

CTS 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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- 4.0.1, 4.0.3 SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
-
- 4.0.2 SR 3.0.2 The specified Frequency for each SR 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 Specification are stated in the individual Specifications.
-
- 4.0.3 SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.
- If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
- When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
-
- 4.0.4 SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

CTS 3.0 SR Applicability

4.0.4 SR 3.0.4 (continued)

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.

**JUSTIFICATION FOR DEVIATIONS
ITS SECTION 3.0, LCO AND SR APPLICABILITY**

1. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01, Section 5.1.3.
2. The brackets have been removed and the proper plant specific information/value has been provided.
3. The words "changes in" in LCO 3.0.4 has been changed to "entry into" to be consistent with the terminology used in SR 3.0.4.
4. The correct LCO number has been provided.

**Improved Standard Technical Specifications (ISTS) Bases
Markup
and Justification for Deviations (JFDs)**

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications, and apply at all times, unless otherwise stated. in Sections 3.1 through 3.9	1
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"> 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. <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 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.</p> <p>Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.</p>	2

BASES

LCO 3.0.2 (continued)

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 LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. 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 LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR 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 Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and either:

- a. An associated Required Action and Completion Time is not met and no other Condition applies, or

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BASES

LCO 3.0.3 (continued)

- 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 LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

This Specification 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 LCO 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 LCO 3.0.3, 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 Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met.
- b. A Condition exists for which the Required Actions have now been performed, or
- 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 LCO 3.0.3 is exited.

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BASES

LCO 3.0.3 (continued)

The time limits of LCO 3.0.3 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, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

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Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.14, "Fuel ~~Storage~~ Pool Water Level." LCO 3.7.14 has an Applicability of "During movement of irradiated fuel assemblies in fuel ~~storage~~ pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.14 are not met while in MODE 1, 2, 3, or 4, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.14 ~~of~~ "Suspend movement of irradiated fuel assemblies in fuel ~~storage~~ pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

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LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

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BASES

LCO 3.0.4 (continued)

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. 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.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

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BASES

LCO 3.0.4 (continued)

LCO 3.0.4.b may be used with single or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. ③

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Containment Air Temperature, Containment Pressure, MQPR, Moderator Temperature Coefficient), and may be applied to other Specifications based on NRC plant specific approval. } ④

The provisions of this Specification 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.

BASES

LCO 3.0.4 (continued)

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate either:

- a. The OPERABILITY of the equipment being returned to service, or
- b. The OPERABILITY of other equipment.

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 Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

BASES

LCO 3.0.5 (continued)

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for supported systems that have a support system LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

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When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

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However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, 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.

BASES

LCO 3.0.6 (continued)

Specification 5.5.15, "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

One aspect of the SFDP is the provision for cross train checks. The SFDP requires the performance of

Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the remaining OPERABLE support systems are OPERABLE, thereby ensuring safety function is retained. A loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to system(s) supported by the inoperable support system is also inoperable (EXAMPLE B 3.0.6-1)
- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable (EXAMPLE B 3.0.6-2) or
- c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable (EXAMPLE B 3.0.6-3).

EXAMPLE B 3.0.6-1 (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5.

EXAMPLE B 3.0.6-2 (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5.

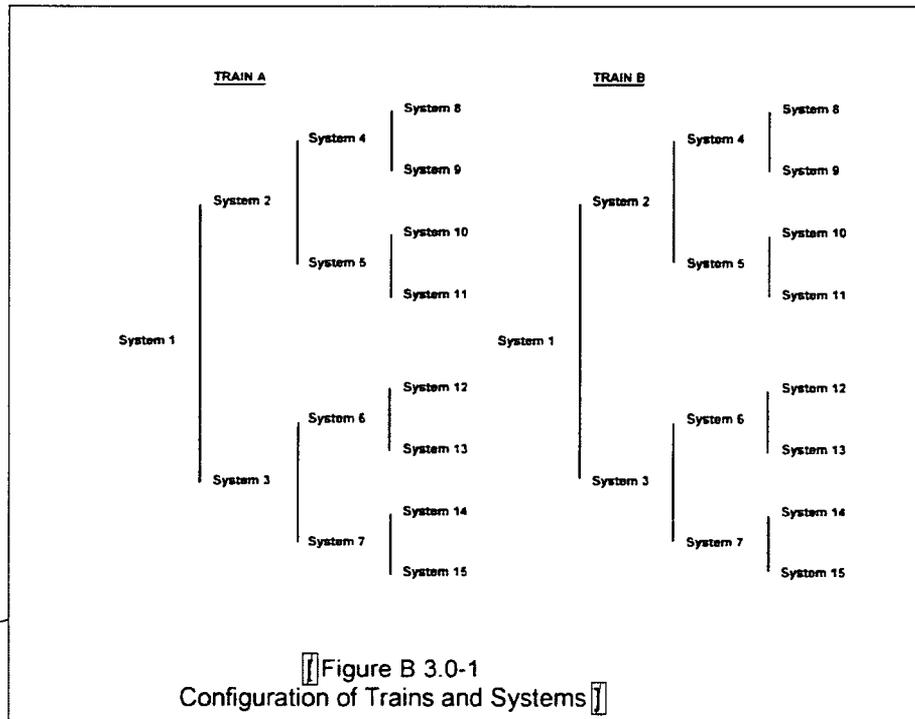
EXAMPLE B 3.0.6-3 (Refer to Figure B 3.0-1)

If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10, and 11.

If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

BASES

LCO 3.0.6 (continued)



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of Section)

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This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations are being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

BASES

LCO 3.0.6 (continued)

When loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately 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 supported system.

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. and Test Exception LCOs [3.1.8, 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.

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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.

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

BASES

LCO 3.0.8 (continued)

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.

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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 should 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.

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page B 3.0-10)

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B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs in Sections 3.1 through 3.9 SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated. 1

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.

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

- a. The systems or components are known to be inoperable, although still meeting the SRs, or 2
- b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a Special Test Exception (STE) LCO are only applicable when the STE LCO is used as an allowable exception to the requirements of a Specification. 7

Test Exception

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition. 8

BASES

SR 3.0.1 (continued)

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 SR 3.0.2, 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 SR 3.0.2. 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.

Some examples of this process are:

- a. Emergency feedwater (EFW) pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. However, if other appropriate testing is satisfactorily completed, the EFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the EFW pump testing.
 - Auxiliary feedwater (AFW) (11)
- b. High pressure injection (HPI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.
 - AFW (11)
 - INSERT 1 (11)

SR 3.0.2

SR 3.0.2 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.

SR 3.0.2 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).

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Main steam safety valve (MSSV) lift setpoint verification performed in-situ requires hot conditions. Provided other appropriate ANSI/ASME OM Code test requirements are satisfactorily completed, startup can proceed and MODE 3 entered with the MSSVs considered OPERABLE. This allows operation to reach the necessary conditions to perform the in-situ lift setpoint verification.

BASES

SR 3.0.2 (continued)

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 SRs. The exceptions to SR 3.0.2 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 Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, 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 SR 3.0.2 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.

SR 3.0.3

SR 3.0.3 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 SR 3.0.2, and not at the time that the specified Frequency was not met.

BASES

SR 3.0.3 (continued)

This delay period provides an adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

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

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 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.

SR 3.0.3 provides 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 SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, [NRC] Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and

BASES

SR 3.0.3 (continued)

aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification 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 Specification 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.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to a Surveillance not being met in accordance with LCO 3.0.4.

BASES

SR 3.0.4 (continued)

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 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 SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

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The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

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The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs 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 LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's 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 SRs' annotation is found in Section 1.4, Frequency.

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**JUSTIFICATION FOR DEVIATIONS
ITS SECTION 3.0 BASES, LCO AND SR APPLICABILITY**

1. The LCO and SR Applicability only apply to Specifications in Sections 3.1 through 3.9; they do not apply to Specifications in Chapters 4.0 and 5.0, unless specifically stated in the individual Specification. Therefore, this statement has been added for clarity.
2. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01, Section 5.1.3.
3. Typographical/grammatical error corrected.
4. The brackets have been removed and the proper plant specific information/value has been provided.
5. The example added to the Bases of LCO 3.0.5 is made to be consistent with the standard for other types of reactors (i.e., NUREG-1433 Rev. 3.1 for the General Electric Boiling Water Reactors).
6. The Figure has been moved to the end of the Section, consistent with the format of the ITS.
7. These changes are made to be consistent with LCO 3.0.7.
8. The ITS SR 3.0.3 Bases allows credit to be taken for unplanned events that satisfy Surveillances. The Bases further states that this allowance also includes those SRs whose performance is normally precluded in a given MODE or other specified condition. This portion of the allowance has been deleted. As documented in Part 9900 of the NRC Inspection Manual, Technical Guidance - Licensee Technical Specifications Interpretations, and in the Bases Control Program (ITS 5.5.13), neither the Technical Specifications Bases nor Licensee generated interpretations can be used to change the Technical Specification requirements. Thus, if the Technical Specifications preclude performance of an SR in certain MODES (as is the case for some SRs in ITS Section 3.8), the Bases cannot change the Technical Specifications requirement and allow the SR to be credited for being performed in the restricted MODES, even if the performance is unplanned.
9. Changes have been made for consistency with similar discussions/terminology in the Bases.
10. These changes are made to be consistent with changes made to LCO 3.0.4.
11. The plant specific terminology has been incorporated. Furthermore, a new plant specific example has been provided since the example in part b is not applicable for Davis-Besse.
12. Changes made for enhanced clarity.
13. This statement has been deleted since the Davis-Besse ITS submittal does not state the snubbers do not meet the 10CFR50.36(c)(2)(ii) criteria. This is also consistent with the NRC SERs for DC Cook Units 1 and 2 and Monticello ITS amendments.

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14. Changes made to be consistent with changes made to ITS 3.7.14.
15. The correct LCO number has been provided.

Specific No Significant Hazards Considerations (NSHCs)

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS SECTION 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGE L01

Davis-Besse is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1430, Rev. 3.1, "Standard Technical Specifications, Babcock and Wilcox Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1430.

CTS 3.0.4 states, "entry into an OPERATIONAL MODE or other specified applicability conditions shall not be made unless the conditions of the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements unless otherwise excepted. CTS 4.0.4 states, "Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirements(s) associated with the Limiting Condition for Operation have been performed with the stated surveillance interval or as otherwise specified. ITS LCO 3.0.4 states "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 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." ITS SR 3.0.4 states, "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This changes the CTS by providing allowances for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. The change is acceptable because LCO 3.0.4 provides the appropriate guidance to enter the Applicability when an LCO is not met. LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c. LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. 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. LCO 3.0.4.b

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allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability. LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. These systems and components are the ECCS Low Pressure Injection Subsystem, the Auxiliary Feedwater System and Motor Driven Feedwater Pump train, and the emergency diesel generators (ITS 3.5.3, ITS 3.7.5, and ITS 3.8.1, respectively). LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason,

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LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

- 1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed change allows entry into a MODE or other specified condition in the applicability of a Technical Specification (TS), while in a TS condition statement and the associated required actions of the TS. Being in a TS condition and the associated required actions is not an initiator of any accident previously evaluated. Therefore, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on the required actions as allowed by proposed LCO 3.0.4, are no different than the consequences of an accident while entering and relying on the required actions while starting in a condition of applicability of the TS. Therefore, the consequences of an accident previously evaluated are not significantly affected by this change. The addition of a requirement to assess and manage the risk introduced by this change will further minimize possible concerns. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

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The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed). Entering into a MODE or other specified condition in the applicability of a TS, while in a TS condition statement and the associated required actions of the TS, will not introduce new failure modes or effects and will not, in the absence of other unrelated failures, lead to an accident whose consequences exceed the consequences of accidents previously evaluated. The addition of a requirement to assess and manage the risk introduced by this change will further minimize possible concerns. Thus, this change does not create the possibility of a new or different kind of accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The proposed change allows entry into a MODE or other specified condition in the applicability of a TS condition statement and the associated required actions of the TS. The TS allow operation of the plant without the full complement of equipment through the conditions for not meeting the TS LCO. The risk associated with this allowance is managed by the imposition of required actions that must be performed within the prescribed completion times. The net effect of being in a TS condition on the margin of safety is not considered significant. The proposed change does not alter the required actions or completion times of the TS. The proposed change allows TS conditions to be entered, and the associated required actions and completion times to be used in new circumstances. In most cases, this use is predicated upon the performance of a risk assessment and the management of plant risk. The change also eliminates current allowances for utilizing required actions and completion times in similar circumstances, without assessing and managing risk. The net change to the margin of safety is insignificant. Therefore, this change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."

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ITS SECTION 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION
FOR
LESS RESTRICTIVE CHANGE L02

Davis-Besse is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1430, Rev. 3.1, "Standard Technical Specifications, Babcock and Wilcox Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1430.

CTS 4.0.2 states "Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval." ITS SR 3.0.2 states "The specified Frequency for each SR 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 Specification are stated in the individual Specifications." This changes the CTS by adding, "If a Completion Time requires periodic performance on a 'once per . . .' basis, the above Frequency extension applies to each performance after the initial performance." The remaining changes to CTS 4.0.2 are discussed in DOC A10 and DOC M01.

This change is acceptable because the 25 percent Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions which must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Required Actions.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change allows the Completion Time for periodic actions to be extended by 25 percent. This change does not significantly affect the probability of an accident. The length of time between performance of Required Actions is not an initiator to any accident previously evaluated. The consequences of any accident previously evaluated are the same during the Completion Time or during any extension of the Completion Time. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the

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proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?**

Response: No.

The proposed change allows the Completion Time for periodic actions to be extended by 25 percent. This change will not physically alter the plant (no new or different type of equipment will be installed). Also, the change does not involve any new or revised operator actions. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Does the proposed change involve a significant reduction in a margin of safety?**

Response: No.

The proposed change allows the Completion Time for periodic actions to be extended by 25 percent. The 25 percent extension allowance is provided for scheduling convenience and is not expected to have a significant effect on the average time between Required Actions. As a result, the Required Actions will continue to provide appropriate compensatory measures for the subject Condition. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, there is a finding of "no significant hazards consideration."