



April 4, 2008

L-MT-08-013
10 CFR 50.90
TSTF-427

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Monticello Nuclear Generating Plant
Docket 50-263
Renewed Operating License No. DPR-22

License Amendment Request: Application for Technical Specification Change
TSTF-427, Add Limiting Condition for Operation 3.0.9 Regarding the Unavailability of
Barriers Using the Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90 the Nuclear Management Company, LLC (NMC) is requesting an amendment to the Technical Specifications (TS) for the Monticello Nuclear Generating Plant (MNGP). The proposed amendment would revise the TS requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9. This LCO establishes conditions under which TS systems would remain operable when required physical barriers are not capable of providing their related support function.

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS pages marked-up to show the proposed change. Enclosure 3 provides the retyped TS pages showing the proposed changes. Enclosure 4 provides draft TS Bases pages (for information) showing the associated bases changes in accordance with 10 CFR 50.36(a).

NMC requests approval of the proposed license amendment by September 15, 2008, with an implementation period of 90 days following startup from the 2009 Refueling Outage.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated Minnesota Official.

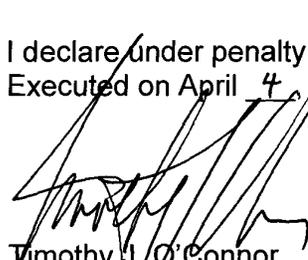
Summary of Commitments

In accordance with the model application for TSTF-427 published in the October 3, 2006, Federal Register, the NMC is proposing the following commitments:

1. The NMC commits to the guidance within Section 11 of NUMARC 93-01, Revision 2, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," which provides guidance and details on the assessment and management of risk during maintenance.
2. The NMC commits to the guidance of NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427), Industry Implementation Guidance," dated March 2006.
3. The NMC will revise procedures to ensure that the guidance on the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall Configuration Risk Management Program to ensure that potentially risk significant configurations resulting from maintenance and other operational activities are identified and avoided.

These commitments will be implemented concurrently with the implementation of this approved license amendment.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on April 4, 2008.



Timothy J. O'Connor
Site Vice President, Monticello Nuclear Generating Plant
Nuclear Management Company, LLC

Enclosures (4)

cc: Administrator, Region III, USNRC
Project Manager, Monticello, USNRC
Resident Inspector, Monticello, USNRC
Minnesota Department of Commerce

ENCLOSURE 1

DESCRIPTION OF CHANGE AND ASSESSMENT

ADD LCO 3.0.9 REGARDING THE UNAVAILABILITY OF BARRIERS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

1.0 DESCRIPTION

In accordance with the provisions of 10 CFR 50.90 the Nuclear Management Company, LLC (NMC) is requesting an amendment to modify the Monticello Nuclear Generating Plant (MNGP) Technical Specifications (TS) by adding requirements for unavailable barriers through the addition of Limiting Condition for Operation (LCO) 3.0.9.

The proposed changes are consistent with the Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Change Traveler, TSTF-427, Revision 2 (Reference 1). A notice of availability of this TS improvement was published in the Federal Register on October 3, 2006 (Reference 2), as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-427 and Published Safety Evaluation

The NMC has reviewed the safety evaluation dated October 3, 2006, as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided in support of TSTF-427. The NMC has concluded that the justifications presented within the TSTF proposal and safety evaluation prepared by the NRC staff are applicable to the MNGP and justify this proposed amendment for the incorporation of the changes to the MNGP TS.

2.2 Optional Changes and Variations

The NMC is not proposing any technical variations or deviations from the TS changes described in the TSTF-427 Revision 2 or the NRC staff's model safety evaluation dated October 3, 2006. However, one editorial variation incorporated in the proposed TS change replaces all occurrences of the term "train" in the proposed LCO 3.0.9 in TSTF-427 Revision 2, with the term "division" to be consistent with the MNGP TS definition of "OPERABLE - OPERABILITY" and the terminology used in Section 1.3, "Completion Times," of the TS.

ENCLOSURE 1

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

The NMC has reviewed the proposed No Significant Hazards Consideration (NSHC) determination published in the Federal Register as part of the CLIP. The NMC has concluded that the proposed NSHC determination presented in this Federal Register notice is applicable to the MNGP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on October 3, 2006, for this TS improvement, plant-specific verifications were performed. In accordance with the model application within the October 3, 2006, Federal Register, the NMC is proposing the following commitments to implement the guidance of NUMARC 93-01 (Reference 3) Section 11 and NEI 04-08 (Reference 4).

1. The NMC commits to the guidance within Section 11 of NUMARC 93-01, Revision 2, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," which provides guidance and details on the assessment and management of risk during maintenance.
2. The NMC commits to the guidance of NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427), Industry Implementation Guidance," dated March 2006.
3. The NMC will revise procedures to ensure that the guidance on the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall Configuration Risk Management Program to ensure that potentially risk significant configurations resulting from maintenance and other operational activities are identified and avoided.

These commitments will be implemented concurrently with the implementation of this approved license amendment.

Also, the NMC has proposed TS Bases changes consistent with TSTF-427, Revision 2, which provides guidance and details on how to implement the new requirements. The MNGP TS include a bases control program in Specification 5.5.9, "Technical Specifications (TS) Bases Control Program," that is consistent with Section 5.5 of the Standard Technical Specifications.

ENCLOSURE 1

4.0 ENVIRONMENTAL EVALUATION

The NMC has reviewed the environmental evaluation included in the model safety evaluation dated October 3, 2006, as part of the CLIIP. The NMC has concluded that the staff's findings presented in that evaluation are applicable to the MNGP and the evaluation is hereby incorporated by reference for this application.

ENCLOSURE 1

5.0 REFERENCES

1. Technical Specification Task Force, Improved Standard Technical Specifications Change Traveler, TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System Operability."
2. Federal Register Notice, Nuclear Regulatory Commission, "Notice of Availability of Model Application Concerning Technical Specification Improvement to Modify Requirements Regarding the Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process," published on October 3, 2006 (71 FR 58444).
3. Nuclear Utility Management and Review Committee (NUMARC) 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Revision 2, dated April 1996.
4. Nuclear Energy Institute (NEI) 04-08, "Risk-Informed Technical Specifications Initiative 7a, Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427), Industry Implementation Guidance," dated March 2006.

ENCLOSURE 2

MONTICELLO NUCLEAR GENERATING PLANT

**ADD LCO 3.0.9 REGARDING THE UNAVAILABILITY OF BARRIERS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

(3 pages follow)

3.0 LIMITING CONDITION FOR OPERATION (LCO) Applicability

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, and LCO 3.0.9.

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.

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

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

Exceptions to this Specification are stated in the individual Specifications.

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

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

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.
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LCO Applicability

LCO 3.0.4 (continued)

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.

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.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

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

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:

NO CHANGES FOR INFORMATION ONLY

LCO Applicability

LCO 3.0.8 (continued)

- a. The snubbers not able to perform their associated support function(s) are associated with only one subsystem of a multiple subsystem supported system or are associated with a single 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 subsystem of a multiple 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.

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) is/are not required to be declared not met solely for this reason for up to 30 days provided that at least one division or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one division or subsystem of a multiple division or subsystem supported system provided at least one division or subsystem of the supported system is OPERABLE and the barriers supporting each of these divisions or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection (HPCI) system, the Reactor Core Isolation Cooling (RCIC) system, and the Automatic Depressurization System (ADS) are considered independent subsystems of a single system.

If the required OPERABLE division or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the divisions or subsystems supported by the barriers that cannot perform their related support function(s).

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

ENCLOSURE 3

MONTICELLO NUCLEAR GENERATING PLANT

**ADD LCO 3.0.9 REGARDING THE UNAVAILABILITY OF BARRIERS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

PROPOSED RETYPED TECHNICAL SPECIFICATION CHANGES

(3 pages follow)

3.0 LIMITING CONDITION FOR OPERATION (LCO) Applicability

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, LCO 3.0.8, and LCO 3.0.9.

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.

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

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

Exceptions to this Specification are stated in the individual Specifications.

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

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

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.
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LCO Applicability

LCO 3.0.4 (continued)

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.

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.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

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

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:

NO CHANGES FOR INFORMATION ONLY

LCO Applicability

LCO 3.0.8 (continued)

- a. The snubbers not able to perform their associated support function(s) are associated with only one subsystem of a multiple subsystem supported system or are associated with a single 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 subsystem of a multiple 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.

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) is/are not required to be declared not met solely for this reason for up to 30 days provided that at least one division or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one division or subsystem of a multiple division or subsystem supported system provided at least one division or subsystem of the supported system is OPERABLE and the barriers supporting each of these divisions or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection (HPCI) system, the Reactor Core Isolation Cooling (RCIC) system, and the Automatic Depressurization System (ADS) are considered independent subsystems of a single system.

If the required OPERABLE division or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the divisions or subsystems supported by the barriers that cannot perform their related support function(s).

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

ENCLOSURE 4

MONTICELLO NUCLEAR GENERATING PLANT

**ADD LCO 3.0.9 REGARDING THE UNAVAILABILITY OF BARRIERS
USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS**

MARKED-UP DRAFT TECHNICAL SPECIFICATION BASES PAGES

(5 pages follow)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) Applicability

BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 <u>3.0.9</u> establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ol style="list-style-type: none"> Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

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

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

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

BASES

LCO 3.0.8 (continued)

because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

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

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single subsystem of a multiple subsystem supported system or to a single 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 subsystem of a multiple 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 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.

NO CHANGES FOR INFORMATION ONLY

BASES

LCO 3.0.9

LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

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

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4),

BASES

LCO 3.0.9 (continued)

and the associated implementation guidance, 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." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more divisions or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one division or subsystem of a multiple division or subsystem supported system, the barriers supporting each of these divisions or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one division of a multiple division supported system if the affected barrier for one division protects against internal flooding and the affected barrier for the other division protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each division.

The High Pressure Coolant Injection (HPCI) and Reactor Core Isolation Cooling (RCIC) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCI system provides backup in case of a RCIC system failure. The Automatic Depressurization System (ADS) and low pressure Emergency Core Cooling System (ECCS) coolant injection provide the core cooling function in the event of failure of the HPCI system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCI system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single division systems in a manner similar to multiple division or subsystem systems.

BASES

LCO 3.0.9 (continued)

If during the time that LCO 3.0.9 is being used, the required OPERABLE division or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the division(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

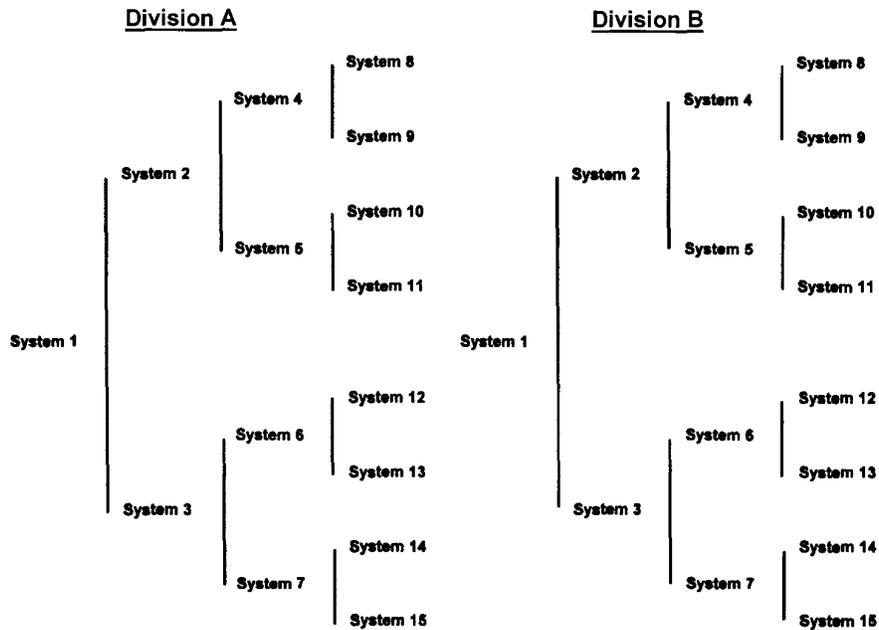


Figure B 3.0-1
Configuration of Divisions and Systems