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Timothy G. Mitchell
Vice President, Operations
Arkansas Nuclear One

1CAN070803

July 21, 2008

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

SUBJECT: License Amendment Request
Regarding Technical Specification Change to Add LCO 3.0.8 on the
Inoperability of Snubbers
Arkansas Nuclear One, Unit 1
Docket No. 50-313
License No. DPR-51

Dear Sir or Madam:

In accordance with the provisions of 10 CFR 50.90, Entergy Operations, Inc. (Entergy) is submitting a request for an amendment to the technical specifications (TS) for Arkansas Nuclear One, Unit 1 (ANO-1).

The proposed amendment would modify TS requirements for inoperable snubbers by adding LCO 3.0.8.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. Attachment 5 provides the existing TS Bases pages marked up to show the proposed change (for information only).

Entergy requests approval of the proposed License Amendment by February 1, 2009, with the amendment being implemented within 60 days.

If you have any questions or require additional information, please contact Dale James at 479-858-4619.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by Entergy to make this request and that the foregoing is true and correct. Executed on July 21, 2008.

Sincerely,

TGM/dbb

Attachments:
1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Regulatory Commitments
5. Proposed Technical Specification Bases Changes (for information only)

cc: Mr. Elmo E. Collins
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U. S. Nuclear Regulatory Commission
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Mr. Bernard R. Bevill
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Attachment 1

To

1CAN070803

Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify Arkansas Nuclear One, Unit 1 (ANO-1) Technical Specification (TS) requirements for inoperable snubbers by adding Limiting Condition for Operation (LCO) 3.0.8.

The changes relating to the addition of LCO 3.0.8 are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification (STS) change TSTF-372 Revision 4. The availability of this TS improvement was published in the *Federal Register* on April 27, 2005, as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Entergy Operations, Inc. (Entergy) has reviewed the safety evaluation dated April 27, 2005 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-372. Entergy has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to ANO-1 and justify this amendment for the incorporation of the changes to the ANO-1 TS.

2.2 Optional Changes and Variations

Item 1(e) of the model Safety Evaluation, Section 3.2, contains the statement "LCO 3.0.8 does not apply to non-seismic snubbers." This does not appear to be captured in the implementation process of the TSTF. Therefore, Entergy proposes to include this statement in the LCO 3.0.8 Bases (see Attachment 5 of this submittal). Further guidance associated with the intent of this statement, as discussed in Section 3.0 of the model SE and in TSTF-IG-05-03, Implementation Guidance for TSTF-372, Revision 4, "Addition of LCO 3.0.8, Inoperability of Snubbers," is also included in the Bases. In addition, the TSTF use of "10 CFR 50.36(c)(2)(ii)" is modified to simply 10 CFR 50.36. This is due to the recent rule change that inadvertently re-designated Part 50.36(c) as Part 50.36(d).

The addition of LCO 3.0.8 resulted in an additional TS page being required and subsequent re-numbering of the pages that follow. This change is administrative in nature and has no bearing on the acceptability of the CLIIP adoption.

The above variations are few and insignificant with regard to ensuring proper application of TSTF-372 intent.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Entergy Operations, Inc. (Entergy) has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the *Federal Register* as part of the CLIIP. Entergy has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to ANO-1 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 April 27, 2005, for this TS improvement, plant-specific verifications were performed as follows.

In the model Safety Evaluation (SE), two requirements (the first of the two having five parts, 1(a) through 1(e)) for application of TSTF-372 are specified. Each is discussed below.

1. Item 1(a) assumes the availability of one Emergency Feedwater (EFW) train during application of LCO 3.0.8.a. TSTF-372, the model SE, and the LCO 3.0.8 TS Bases required to be adopted in conjunction with implementation of TSTF-372 all state the application of LCO 3.0.8.a is contingent on the assumption that the redundant train remains available. In addition, loss of both EFW trains during operation in the Modes of Applicability associated with EFW would result in LCO 3.0.3 entry, rendering the allowances of LCO 3.0.8 ineffective. Although the TS implementation process at ANO may include this restriction in other procedure or administrative processes upon approval of this amendment, Entergy does not believe further action is required to ensure compliance with Item 1(a) since the aforementioned documents inherently prevent application of LCO 3.0.8.a due to a snubber-related condition which could render both trains of any TS system inoperable and, LCO 3.0.3 entry would be required if both EFW trains were found to be inoperable during associated Modes of Applicability for any reason.

2. Item 1(b) requires either one EFW train or similar core cooling method to be available when one or more snubbers are inoperable that affect two trains of a given system. As described above, there are no instances where both EFW trains, or both trains of any system being relied upon as the only core cooling method would be removed from service during a Mode of Applicability that requires these systems. Again, such a plant configuration would result in LCO 3.0.3 entry, which prevents the utilization of the 12-hour allowance of LCO 3.0.8.b. Although the TS implementation process at ANO may include this restriction in other procedure or administrative processes upon approval of this amendment, Entergy does not believe further action is required to ensure compliance with Item 1(b).

3. Items 1(c) and 1(d) are only applicable to west coast plants and boiling water reactors and, therefore, are not applicable to ANO-1.

4. The first portion of Item (1e) relates to Items 1(a) and 1(b), discussed above. The statement "LCO 3.0.8 does not apply to non-seismic snubbers" is added to the TS Bases (see markup in Attachment 5 of this submittal). This is a minor deviation from TSTF-372 and is discussed in Section 2.2 above. The remaining portion of Item 1(e) requires a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic) and implementation of any Tier 2 restrictions to be completed and available for staff inspection. Entergy will ensure, during implementation of the LCO 3.0.8 snubber requirements, that the TRM Actions are modified, in accordance with 10 CFR 50.59, to require recognition of the design function of the inoperable snubber (i.e., seismic vs. non-seismic) and implementation of any Tier 2 restrictions each time a required snubber is rendered inoperable. This commitment is included in Attachment 4 of this submittal.

5. Item 2 discusses the availability and use of risk management. ANO-1 has and maintains a Continuous Risk Management Program (CRMP) and associated risk-related tools to meet the intent of 10 CFR 50.65(a)(4) of the Maintenance Rule. Entergy will revise station procedures or administrative process to ensure seismic risks are considered during application of the LCO 3.0.8 delay period when one or more snubbers are inoperable. This commitment is included in Attachment 4 of this submittal.

In addition to the above, Entergy will establish TS Bases for LCO 3.0.8 which provide guidance and details on how to implement the new requirements. This commitment is included in Attachment 4 of this submittal. LCO 3.0.8 requires that risk be managed and assessed. The Bases also state that while the Industry and NRC guidance on implementation of 10 CFR 50.65(a)(4), the Maintenance Rule, does not address seismic risk, 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 assessment of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Finally, ANO-1 has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL EVALUATION

Entergy has reviewed the environmental evaluation included in the model safety evaluation dated April 27, 2005, as part of the CLIIP. Entergy has concluded that the staff's findings presented in that evaluation are applicable to ANO-1 and the evaluation is hereby incorporated by reference for this application.

Attachment 2

To

1CAN070803

Proposed Technical Specification Changes

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, ~~and~~ LCO 3.0.7, and LCO 3.0.8.

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 3 within 7 hours;

b. MODE 4 within 13 hours; and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

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

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

LCO 3.0.4

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

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

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

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

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

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

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 5.5.15, "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

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.

3.0 LCO APPLICABILITY

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.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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.

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.

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.

3.0 SR APPLICABILITY

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.

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.

Attachment 3

To

1CAN070803

Revised Technical Specification Pages

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.

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 3 within 7 hours;

b. MODE 4 within 13 hours; and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

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

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

LCO 3.0.4

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

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

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

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

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

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

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 5.5.15, "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

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.

3.0 LCO APPLICABILITY

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.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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.

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.

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.

3.0 SR APPLICABILITY

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.

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.

Attachment 4

To

1CAN070803

Regulatory Commitments

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE
	ONE-TIME ACTION	CONTINUING COMPLIANCE	
Entergy will establish the Technical Specification (TS) Bases for Limiting Condition for Operation (LCO) 3.0.8 as adopted with the applicable license amendment.	✓		To be implemented in conjunction with the amendment
Entergy will ensure, during implementation of the LCO 3.0.8 snubber requirements, that the TRM Actions are modified, in accordance with 10 CFR 50.59, to require recognition of the design function of the inoperable snubber (i.e., seismic vs. non-seismic) and implementation of any Tier 2 restrictions each time a required snubber is rendered inoperable.	✓		To be implemented in conjunction with the amendment
Entergy will revise station procedures or administrative process to ensure seismic risks are considered during application of the LCO 3.0.8 delay period when one or more snubbers are inoperable.	✓		Prior to or in conjunction with implementation of the amendment

Attachment 5

To

1CAN070803

Proposed Technical Specification Bases Changes
(for information only)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs

LCO 3.0.1 through LCO 3.0.~~87~~ establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

LCO 3.0.1

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

LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and

b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

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

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

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."

BASES

LCO APPLICABILITY (continued)

LCO 3.0.6 (continued) When a 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. Test Exception LCOs 3.1.8 and 3.1.9 allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

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

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

BASES

LCO APPLICABILITY (continued)

LCO 3.0.8 (continued)

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 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 allowed outage time (AOT) 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 AOT 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.

LCO 3.0.8 does not apply to non-seismic snubbers. The provisions of LCO 3.0.8 are not to be applied to supported TS systems unless the supported systems would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.

BASES

LCO APPLICABILITY (continued)

LCO 3.0.8 (continued) The risk impact of dynamic loadings other than seismic loads was not assessed as part of the development of LCO 3.0.8. These shock-type loads include thrust loads, blowdown loads, water-hammer loads, steam-hammer loads, LOCA loads and pipe rupture loads. However, there are some important distinctions between non-seismic (shock-type) loads and seismic loads which indicate that, in general, the risk impact of the out-of-service snubbers is smaller for non-seismic loads than for seismic loads. First, while a seismic load affects the entire plant, the impact of a non-seismic load is localized to a certain system or area of the plant. Second, although non-seismic shock loads may be higher in total force and the impact could be as much or more than seismic loads, generally they are of much shorter duration than seismic loads. Third, the impact of non-seismic loads is more plant specific, and thus harder to analyze generically, than for seismic loads. For these reasons, every time LCO 3.0.8 is applied, at least one train of each system that is supported by the inoperable snubber(s) should remain capable of performing their required safety or support functions for postulated design loads other than seismic loads.