

October 14, 2008

TSTF-08-18
PROJ0753U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001**SUBJECT:** Transmittal of TSTF-512, Revision 0, "Revise SR 3.0.3 to Address SRs that Cannot be Performed or are Not Met"

Dear Sir or Madam:

Enclosed for NRC review is TSTF-512, Revision 0, "Revise SR 3.0.3 to Address SRs that Cannot be Performed or are Not Met." TSTF-512 is applicable to all plant types.

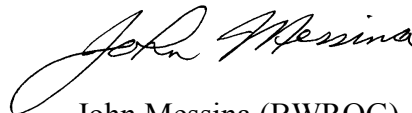
Any NRC review fees associated with the review of TSTF-512 should be billed to the Boiling Water Reactor Owners Group.

The TSTF requests that the Traveler be made available under the Consolidated Line Item Improvement Process.

Should you have any questions, please do not hesitate to contact us.



Bert Yates (PWROG/W)



John Messina (BWROG)



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Reene' Gambrell (PWROG/B&W)

Enclosure

cc: Robert Elliott, Technical Specifications Branch, NRC
Matthew Hamm, Technical Specifications Branch, NRC

Technical Specification Task Force Improved Standard Technical Specifications Change Traveler

Revise SR 3.0.3 to Address SRs that Cannot be Performed or are Not Met

NUREGs Affected: 1430 1431 1432 1433 1434

Classification 1) Technical Change

Recommended for CLIP?: Yes

Correction or Improvement: Improvement

NRC Fee Status: Not Exempt

Benefit: Increases Equipment Operability

Industry Contact: Bert Yates, (314) 225-1702, gyates@ameren.com

See attached justification.

Revision History

OG Revision 0

Revision Status: Active

Revision Proposed by: PWROG LSC

Revision Description:

Original Issue

Owners Group Review Information

Date Originated by OG: 01-Mar-08

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 15-Sep-08

TSTF Review Information

TSTF Received Date: 22-Sep-08

Date Distributed for Review 22-Sep-08

OG Review Completed: BWOG WOG CEOG BWROG

TSTF Comments:

(No Comments)

TSTF Resolution: Approved

Date: 14-Oct-08

NRC Review Information

NRC Received Date: 14-Oct-08

Affected Technical Specifications

SR 3.0.1

SR Applicability

14-Oct-08

SR 3.0.1 Bases SR Applicability

SR 3.0.3 SR Applicability

SR 3.0.3 Bases SR Applicability

SR 3.0.4 Bases SR Applicability

1.0 Description

SR 3.0.3 provides an allowance for surveillances that are missed. The proposed Traveler revises SR 3.0.3 to move the existing allowance to SR 3.0.3.a. A new allowance that addresses Surveillances that cannot be performed within the Specified Frequency is added as SR 3.0.3.b. A new allowance that addresses the situation of an SR that is not met but the associated LCO is otherwise met is included as a new SR 3.0.3.c. SR 3.0.1 is modified to state that SR 3.0.3 provides an exception to that requirement.

2.0 Proposed Change

SR 3.0.3 is revised to have three parts. SR 3.0.3.a is the same as the existing SR 3.0.3. SR 3.0.3.b addresses the situation in which it is discovered that an SR cannot be performed before the expiration of the specified Frequency. SR 3.0.3.c addresses the situation in which it is discovered that an SR is not met but the LCO is still met.

SR 3.0.1 is revised to reference the exception provided by the revised SR 3.0.3.

The SR 3.0.3 Bases are revised to provide discussion of the proposed changes. In addition, a paragraph is added discussing the application of SR 3.0.3 (as proposed SR 3.0.3.a) to Surveillances that have never been performed. This discussion incorporates existing industry guidance.

The SR 3.0.1 and SR 3.0.4 Bases are revised to address the exceptions provided by SR 3.0.3.

3.0 Background

TSTF-358-A, Revision 6, "Missed Surveillance Requirements," was approved by the NRC on September 28, 2001. TSTF-358 was a risk-informed change that allowed a longer period to perform missed Surveillances. All but two sites in the U.S. have adopted TSTF-358-A.

SR 3.0.3 provides an allowance for surveillances that are missed. In other words, if it is discovered that a Surveillance was not performed within the specified Frequency, SR 3.0.3 provides time to perform the SR before declaring the SR not met.

There is a situation that has a similar safety significance to a missed Surveillance that is not addressed in SR 3.0.3. If it is discovered that a Surveillance cannot be performed prior to the expiration of the specified Frequency, there is no recourse but to declare the SR not met when the specified Frequency expires. For example, a broken sample valve may prevent taking a reactor coolant system (RCS) sample to measure RCS activity. If this is discovered one minute after the specified Frequency of the Surveillance is expired, then SR 3.0.3 allows up to the Frequency to perform the Surveillance (assuming a risk assessment supports the extension). If, however, it is discovered one minute before the specified Frequency is expired, there is no allowance and the Surveillance must be

declared not met, the LCO must be declared not met, and the Required Actions followed (up to and including a plant shutdown).

Another situation regarding the performance of Surveillances to be addressed is when a Surveillance is not met but the associated LCO is still met. In accordance with 10 CFR 50.36, the purpose of SRs is to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. However, in some limited circumstances a Surveillance may not be met but the associated LCO may still be met. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be Operable (i.e., capable of performing its specified safety function(s)). However, SR 3.0.1 would require declaring the LCO not met, and the Required Actions followed (up to and including a plant shutdown).

The proposed change addresses both of these situations with a change to SR 3.0.3.

4.0 Technical Analysis

SR 3.0.3.a

The proposed SR 3.0.3.a contains the same requirements as SR 3.0.3 as approved by the NRC in TSTF-358-A.

The Bases of SR 3.0.3.a are revised to provide a discussion of the application of SR 3.0.3.a to Surveillances that have never been performed. This discussion incorporates existing industry guidance which provides restrictions on the use of SR 3.0.3.a in this situation. SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b

The accident analyses presented in the UFSAR do not address the performance of Surveillance Requirements. The accident analyses assume that the necessary equipment is available and then, in most cases, assumes the single most limiting active failure occurs. Therefore, this proposal to extend the time allowed to perform a Surveillance that is met but cannot be performed within the specified Frequency would not affect the accident analyses, as long as the equipment was, in fact, Operable.

The risk of a Surveillance that cannot be performed within the specified Frequency and that of a Surveillance that is discovered to have not been performed within the specified

Frequency is exactly the same. In both cases, if there is reasonable assurance that the Surveillance will be met when performed, the delay time has the same effect.

Providing a delay time up to 24 hours is a reasonable period to allow performing the Surveillance given the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. A delay beyond 24 hours must be assessed under the plant specific Probabilistic Safety Assessments (PSAs), which will consider the time between Surveillances as the longest period that a particular component may be inoperable without detection. This time period may be used in determining the component basic event (BE) failure probabilities for standby components. To evaluate the potential impact of a Surveillance that cannot be performed on plant risk, the component failure probability can be increased proportionally to the time interval from the last test to the next expected test of the component. This new component failure probability can then be factored into the PSA model and the impact on CDF and/or LERF can be determined.

It is expected that there are few standby components for which the inability to perform a Surveillance would result in a significant impact on plant risk as measured by CDF and LERF. Doubling component failure probabilities, assuming the Surveillance test interval doubled, results in only a few plant components providing a significant impact on risk. The vast majority of the components have little or no impact on risk.

Additionally, the inability to perform a Surveillance is a rare occurrence, which when combined with the assumption that the equipment being tested is inoperable, results in a very small increase in plant risk.

For those Surveillances that are potentially risk-significant, the requirement to perform a risk evaluation if it is extended beyond 24 hours will ensure the risk remains acceptable. So even though the historical data and typical PSA results show an overall small risk increase for this change, the risk evaluation requirements will ensure that the risk increase for a given Surveillance extension is also acceptable.

Overall, due to the avoidance of unnecessary shutdowns, the low number of potentially risk-significant Surveillances, and the requirement for a risk evaluation if a Surveillance is extended, the change is considered a risk reduction to risk neutral. Additionally, the change represents a burden reduction for both the plant and the NRC.

SR 3.0.3.c

As discussed above, the accident analyses presented in the UFSAR do not address the performance of Surveillance Requirements. The accident analyses assume that the necessary equipment is available and then, in most cases, assumes the single most limiting active failure occurs. Therefore, the analysis is based on a system performing its specified safety function, not the particular performance of an SR.

Typically Surveillances are directly tied to the ability of a system to perform its specified safety function. For example, minimum pump flow, containment temperature, instrument channel calibrations, and shutdown margin are integral assumptions in the accident

analysis and to the Operability of the associated systems. However, there are some Surveillances that are not directly tied to the subject system being capable of performing its specified safety function. For example, ventilation system charcoal filters are typically bypassed during normal operation to extend the life of the charcoal bed. On receipt of an accident signal, dampers redirect air flow to the filters. If flow is directed to the filter at all times, the charcoal will need to be replaced more frequently but the ventilation system will be fully capable of performing its specified safety function. In another example, the automatic start signal of a pump may not be functional but the pump may be capable of being started manually within the time assumptions of the accident analysis, such that it is fully capable of performing its specified safety function should an accident occur. Regulatory Issue Summary 2005-20, "Operability Determinations & Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety," Appendix C.5, provides guidance on using manual action in lieu of automatic action. However, if a Surveillance explicitly requires testing of the automatic action, this guidance cannot be applied and the LCO is not met.

Application of SR 3.0.3.c requires a documented determination that, with the exception of the Surveillance, the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for NRC review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that, with the exception of the Surveillance, the LCO is met must consider all aspects of meeting the LCO. If the LCO requires Operability, the documented determination must consider all aspects of Operability and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that, with the exception of the Surveillance, the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until the Applicability of the Specification is entered following the next refueling outage, whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met. The option of delaying performance until the next refueling outage is necessary due to the possibility that repairs required to support the test may require a shutdown in order to complete. This is acceptable since the component required by the LCO will continue to be capable of performing its specified safety function during the delay period.

SR 3.0.3.c does not require a risk evaluation. PSAs consider system availability, not performance of Surveillances. If the associated system is capable of performing its

specified safety function, there will be no change to plant risk resulting from failure to meet the SR.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While a delay period up to the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

5.0 Regulatory Analysis

5.1 No Significant Hazards Consideration

The TSTF has evaluated whether or not a significant hazards consideration is involved with the proposed generic change 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 relaxes the time allowed to perform a Surveillance and provides the option to not meet an Surveillance provided the associated system is Operable. The performance of Surveillances is not an initiator to any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The equipment being tested is still required to be Operable and capable of performing the accident mitigation functions assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly affected.

Therefore, it is concluded that 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.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or a change in the methods governing normal plant operation.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed change relaxes the time allowed to perform a Surveillance and provides the option to not meet an Surveillance provided the associated system is Operable. As supported by the historical data, the likely outcome of any Surveillance is verification that the LCO is met. Failure to perform a Surveillance within the prescribed Frequency does not cause equipment to become inoperable. Similarly, relaxing the time to declare an associated system inoperable when a Surveillance cannot be met but it can be demonstrated that the associated system is Operable will have little effect on the margin of safety, which is more directly tied to the Operability of the equipment, not performance of the Surveillance. The only effect of the additional time allowed to address Surveillances on the margin of safety is the small chance that a system documented to be Operable is not, in fact, found to be Operable. This must be balanced against the real risk of manipulating the plant equipment or establishing the plant conditions needed to perform or meet the Surveillance. In addition, parallel trains and alternate equipment are typically available to perform the safety function of the equipment not tested.

Therefore, it is concluded that this change does not involve a significant reduction in a margin of safety.

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

5.2 Applicable Regulatory Requirements/Criteria

Title 10 of the Code of Federal Regulations, Paragraph 50.36, requires Technical Specifications to contain Surveillances. It states, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." The proposed change addresses the actions to be take when Surveillances are not performed, or will not be performed within the specified Frequency, or if the Surveillance is not met. The regulations do not address these conditions and the proposed change does not violate the 50.36 requirement to have Surveillances.

Based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's

regulations, and (3) the approval of the proposed change will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

A review has determined that the proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

7.0 References

None.

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 except as provided in SR 3.0.3. 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 is not met or was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, as described below. This is an exception to SR 3.0.1. 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.~~

a. 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.

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- b. If it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is due to be performed, 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 from the time the Surveillance is due to be performed 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.

- c. If it is discovered that a Surveillance is not met or will not be met and it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until completion of the next scheduled refueling outage, whichever is greater. If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

If the Surveillance is not met within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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.

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 except as provided in SR 3.0.3. 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 is not met or was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, as described below. This is an exception to SR 3.0.1. ~~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.~~

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~~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.~~

a. 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.

- b. If it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is due to be performed, 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 from the time the Surveillance is due to be performed 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.

- c. If it is discovered that a Surveillance is not met or will not be met and it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until completion of the next scheduled refueling outage, whichever is greater. If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

If the Surveillance is not met within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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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.

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 except as provided in SR 3.0.3. 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.

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Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If ~~it is discovered that~~ a Surveillance ~~is not met or was~~ not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, as described below. This is an exception to SR 3.0.1. ~~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.~~

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~~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.~~

a. 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.

- b. If it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is due to be performed, 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 from the time the Surveillance is due to be performed 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.

- c. If it is discovered that a Surveillance is not met or will not be met and it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until completion of the next scheduled refueling outage, whichever is greater. If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

If the Surveillance is not met within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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 except as provided in SR 3.0.3. 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 is not met or was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, as described below. This is an exception to SR 3.0.1. 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.~~

a. 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.

- b. If it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is due to be performed, 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 from the time the Surveillance is due to be performed 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.

- c. If it is discovered that a Surveillance is not met or will not be met and it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until completion of the next scheduled refueling outage, whichever is greater. If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

If the Surveillance is not met within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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.

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 except as provided in SR 3.0.3. 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 is not met or was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, as described below. This is an exception to SR 3.0.1. ~~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.~~

a. 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.

- b. If it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is due to be performed, 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 from the time the Surveillance is due to be performed 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.

- c. If it is discovered that a Surveillance is not met or will not be met and it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency, or until completion of the next scheduled refueling outage, whichever is greater. If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

If the Surveillance is not met within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

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.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	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.
SR 3.0.1	<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> a. The systems or components are known to be inoperable, although still meeting the SRs or b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances, <u>except as provided by SR 3.0.3.</u> <p>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.</p> <p>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.</p>

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, cannot be performed, or is not met.

SR 3.0.3 is an exception to SR 3.0.1. Successful 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 3.0.3 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.

SR 3.0.3.a and SR 3.0.3.b

SR 3.0.3.a applies when it is discovered that a Surveillance was not performed within its specified Frequency. In order for SR 3.0.3.a to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must be expired. If SR 3.0.3.a is applied, 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. 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.

SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b applies when it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met. It may not be possible to perform a Surveillance due to failure of the equipment needed to perform the Surveillance (such as test equipment) or failure of equipment needed to obtain the information or establish the conditions to perform the test (such as failure of a valve in a test line). In order for SR 3.0.3.b to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must not be expired. If SR 3.0.3.b is applied, then compliance with the requirement to declare the LCO not met may be delayed, from the time of the Surveillance is due (including the allowance of SR 3.0.2), up to 24 hours or up to the limit of the specified Frequency, whichever is greater. 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 the Surveillance Frequency expires in accordance with SR 3.0.2, and not at the time that it is discovered that the SR cannot be performed.

In order to apply SR 3.0.3.a or SR 3.0.3.b, there must be reasonable assurance that the Surveillance, when performed, will be 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 and necessary equipment, 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, or an Administrative Controls program, (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, or in accordance with the Inservice Testing Program, etc.) is discovered to not have been performed when specified or cannot be performed within the specified Frequency, SR 3.0.3.a and SR 3.0.3.b 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.~~

~~Use of SR 3.0.3.a or SR 3.0.3.b 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.a and SR 3.0.3.b 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 that are missed or cannot be performed within their specified Frequency 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.

SR 3.0.3.c

SR 3.0.3.c applies when it is discovered that a Surveillance is not met or will not be met. SR 3.0.1 states that failure to meet a Surveillance shall be failure to meet the LCO. However, in some circumstances it is possible for a Surveillance to not be met and the specified safety function for equipment to otherwise be met or variables to be within limit. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be OPERABLE (i.e., capable of performing its specified safety function(s)). However, without the exception of SR 3.0.3.c, SR 3.0.1 would require declaring the LCO not met.

Application of SR 3.0.3.c requires a documented determination that the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the

documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that the LCO is met must consider all aspects of meeting the LCO. If the LCO requires OPERABILITY, the documented determination must consider all aspects of OPERABILITY and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, requirements of regulations, or an Administrative Controls program, (e.g., prior to entering MODE 1 after each fuel loading, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, or In accordance with the Inservice Testing Program, etc.) is not met, SR 3.0.3.c allows for the full delay period of up to the specified Frequency to perform the Surveillance or entry into the Applicability of the Specification following the next refueling outage, whichever is greater. However, since there is not a time interval specified, actions should be taken to meet the Surveillance at the first reasonable opportunity.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While the period of the specified Frequency or entry into the Applicability of the Specification following the next refueling outage, whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

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, except as provided by SR 3.0.3.

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.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	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.
SR 3.0.1	<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> a. The systems or components are known to be inoperable, although still meeting the SRs; or b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances, <u>except as provided by SR 3.0.3.</u> <p>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 test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.</p> <p>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.</p> <p>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</p>

BASES

SR 3.0.2 (continued)

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, cannot be performed, or is not met.

SR 3.0.3 is an exception to SR 3.0.1. Successful 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 3.0.3 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.

SR 3.0.3.a and SR 3.0.3.b

SR 3.0.3.a applies when it is discovered that a Surveillance was not performed within its specified Frequency. In order for SR 3.0.3.a to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must be expired. If SR 3.0.3.a is applied, 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. 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.

SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b applies when it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met. It may not be possible to perform a Surveillance due to failure of the equipment needed to perform the Surveillance (such as test equipment) or failure of equipment needed to obtain the information or establish the conditions to perform the test (such as failure of a valve in a test line). In order for SR 3.0.3.b to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must not be expired. If SR 3.0.3.b is applied, then compliance with the requirement to declare the LCO not met may be delayed, from the time of the Surveillance is due (including the allowance of SR 3.0.2), up to 24 hours or up to the limit of the specified Frequency, whichever is greater. 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 the Surveillance Frequency expires in accordance with SR 3.0.2, and not at the time that it is discovered that the SR cannot be performed.

In order to apply SR 3.0.3.a or SR 3.0.3.b, there must be reasonable assurance that the Surveillance, when performed, will be met.

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

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel and necessary equipment, 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.

BASES

SR 3.0.3 (continued)

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, ~~or~~ requirements of regulations, or an Administrative Controls program, (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, or in accordance with the Inservice Testing Program, etc.) is discovered to not have been performed when specified or cannot be performed within the specified Frequency, SR 3.0.3.a and SR 3.0.3.b 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.~~

Use of SR 3.0.3.a or SR 3.0.3.b 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.a and SR 3.0.3.b 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 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 that are missed or cannot be performed within their specified Frequency will be placed in the licensee's Corrective Action Program.

BASES

SR 3.0.3 (continued)

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.

SR 3.0.3.c

SR 3.0.3.c applies when it is discovered that a Surveillance is not met or will not be met. SR 3.0.1 states that failure to meet a Surveillance shall be failure to meet the LCO. However, in some circumstances it is possible for a Surveillance to not be met and the specified safety function for equipment to otherwise be met or variables to be within limit. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be OPERABLE (i.e., capable of performing its specified safety function(s)). However, without the exception of SR 3.0.3.c, SR 3.0.1 would require declaring the LCO not met.

Application of SR 3.0.3.c requires a documented determination that the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that the LCO is met must consider all aspects of meeting the LCO. If the LCO requires OPERABILITY, the documented determination must consider all aspects of OPERABILITY and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from

the time the Surveillance is not met up to the period of the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, requirements of regulations, or an Administrative Controls program, (e.g., prior to entering MODE 1 after each fuel loading, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, or In accordance with the Inservice Testing Program, etc.) is not met, SR 3.0.3.c allows for the full delay period of up to the specified Frequency to perform the Surveillance or entry into the Applicability of the Specification following the next refueling outage, whichever is greater. However, since there is not a time interval specified, actions should be taken to meet the Surveillance at the first reasonable opportunity.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While the period of the specified Frequency or entry into the Applicability of the Specification following the next refueling outage, whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

~~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, except as provided by SR 3.0.3.

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.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	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.
SR 3.0.1	<p>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.</p> <p>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 either:</p> <ol style="list-style-type: none"> a. The systems or components are known to be inoperable, although still meeting the SRs or b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances, <u>except as provided by SR 3.0.3.</u> <p>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) are only applicable when the STE is used as an allowable exception to the requirements of a Specification.</p> <p>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.</p> <p>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</p>

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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, cannot be performed, or is not met.

SR 3.0.3 is an exception to SR 3.0.1. Successful 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 3.0.3 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.

SR 3.0.3.a and SR 3.0.3.b

SR 3.0.3.a applies when it is discovered that a Surveillance was not performed within its specified Frequency. In order for SR 3.0.3.a to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must be expired. If SR 3.0.3.a is applied, 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. 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.

SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b applies when it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met. It may not be possible to perform a Surveillance due to failure of the equipment needed to perform the Surveillance (such as test equipment) or failure of equipment needed to obtain the information or establish the conditions to perform the test (such as failure of a valve in a test line). In order for SR 3.0.3.b to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must not be expired. If SR 3.0.3.b is applied, then compliance with the requirement to declare the LCO not met may be delayed, from the time of the Surveillance is due (including the allowance of SR 3.0.2), up to 24 hours or up to the limit of the specified Frequency, whichever is greater. 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 the Surveillance Frequency expires in accordance with SR 3.0.2, and not at the time that it is discovered that the SR cannot be performed.

In order to apply SR 3.0.3.a or SR 3.0.3.b, there must be reasonable assurance that the Surveillance, when performed, will be met.

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

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SR 3.0.3 (continued)

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel and necessary equipment, 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, or an Administrative Controls program, (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, or in accordance with the Inservice Testing Program, etc.) is discovered to not have been performed when specified or cannot be performed within the specified Frequency, SR 3.0.3.a and SR 3.0.3.b 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.~~

Use of SR 3.0.3.a or SR 3.0.3.b 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.a and SR 3.0.3.b 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 aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant

BASES

SR 3.0.3 (continued)

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 that are missed or cannot be performed within their specified Frequency 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.

SR 3.0.3.c

SR 3.0.3.c applies when it is discovered that a Surveillance is not met or will not be met. SR 3.0.1 states that failure to meet a Surveillance shall be failure to meet the LCO. However, in some circumstances it is possible for a Surveillance to not be met and the specified safety function for equipment to otherwise be met or variables to be within limit. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be OPERABLE (i.e., capable of performing its specified safety function(s)). However, without the exception of SR 3.0.3.c, SR 3.0.1 would require declaring the LCO not met.

Application of SR 3.0.3.c requires a documented determination that the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that the LCO is met must consider all aspects of meeting the LCO. If the LCO requires OPERABILITY, the documented determination must consider all aspects of OPERABILITY and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, requirements of regulations, or an Administrative Controls program, (e.g., prior to entering MODE 1 after each fuel loading, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, or In accordance with the Inservice Testing Program, etc.) is not met, SR 3.0.3.c allows for the full delay period of up to the specified Frequency to perform the Surveillance or entry into the Applicability of the Specification following the next refueling outage, whichever is greater. However, since there is not a time interval specified, actions should be taken to meet the Surveillance at the first reasonable opportunity.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While the period of the specified Frequency or entry into the Applicability of the Specification following the next refueling outage, whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

~~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, except as provided by SR 3.0.3.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	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.
SR 3.0.1	<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> a. The systems or components are known to be inoperable, although still meeting the SRs or b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances, <u>except as provided by SR 3.0.3.</u> <p>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 Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.</p> <p>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.</p>

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 Primary 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, cannot be performed, or is not met.

SR 3.0.3 is an exception to SR 3.0.1. Successful 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 3.0.3 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.

SR 3.0.3.a and SR 3.0.3.b

SR 3.0.3.a applies when it is discovered that a Surveillance was not performed within its specified Frequency. In order for SR 3.0.3.a to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must be expired. If SR 3.0.3.a is applied, 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. 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.

SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b applies when it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met. It may not be possible to perform a Surveillance due to failure of the equipment needed to perform the Surveillance (such as test equipment) or failure of equipment needed to obtain the information or establish the conditions to perform the test (such as failure of a valve in a test line). In order for SR 3.0.3.b to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must not be expired. If SR 3.0.3.b is applied, then compliance with the requirement to declare the LCO not met may be delayed, from the time of the Surveillance is due (including the allowance of SR 3.0.2), up to 24 hours or up to the limit of the specified Frequency, whichever is greater. 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 the Surveillance Frequency expires in accordance with SR 3.0.2, and not at the time that it is discovered that the SR cannot be performed.

In order to apply SR 3.0.3.a or SR 3.0.3.b, there must be reasonable assurance that the Surveillance, when performed, will be met.

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SR 3.0.3 (continued)

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

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel and necessary equipment, 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, or an Administrative Controls program, (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, or in accordance with the Inservice Testing Program, etc.) is discovered to not have been performed when specified or cannot be performed within the specified Frequency, SR 3.0.3.a and SR 3.0.3.b 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.~~

~~Use of SR 3.0.3.a or SR 3.0.3.b 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.a and SR 3.0.3.b 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 that are missed or cannot be performed within their specified Frequency 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.

SR 3.0.3.c

SR 3.0.3.c applies when it is discovered that a Surveillance is not met or will not be met. SR 3.0.1 states that failure to meet a Surveillance shall be failure to meet the LCO. However, in some circumstances it is possible for a Surveillance to not be met and the specified safety function for equipment to otherwise be met or variables to be within limit. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be OPERABLE (i.e., capable of performing its specified safety function(s)). However, without the exception of SR 3.0.3.c, SR 3.0.1 would require declaring the LCO not met.

Application of SR 3.0.3.c requires a documented determination that the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the

documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that the LCO is met must consider all aspects of meeting the LCO. If the LCO requires OPERABILITY, the documented determination must consider all aspects of OPERABILITY and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, requirements of regulations, or an Administrative Controls program, (e.g., prior to entering MODE 1 after each fuel loading, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, or In accordance with the Inservice Testing Program, etc.) is not met, SR 3.0.3.c allows for the full delay period of up to the specified Frequency to perform the Surveillance or entry into the Applicability of the Specification following the next refueling outage, whichever is greater. However, since there is not a time interval specified, actions should be taken to meet the Surveillance at the first reasonable opportunity.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While the period of the specified Frequency or entry into the Applicability of the Specification following the next refueling outage, whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

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, except as provided by SR 3.0.3.

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.

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs	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.
SR 3.0.1	<p>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.</p> <p>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:</p> <ol style="list-style-type: none"> a. The systems or components are known to be inoperable, although still meeting the SRs or b. The requirements of the Surveillance(s) are known to be not met between required Surveillance performances, <u>except as provided by SR 3.0.3.</u> <p>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 Operations LCO are only applicable when the Special Operations LCO is used as an allowable exception to the requirements of a Specification.</p> <p>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.</p>

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 Primary 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, cannot be performed, or is not met.

SR 3.0.3 is an exception to SR 3.0.1. Successful 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 3.0.3 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.

SR 3.0.3.a and SR 3.0.3.b

SR 3.0.3.a applies when it is discovered that a Surveillance was not performed within its specified Frequency. In order for SR 3.0.3.a to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must be expired. If SR 3.0.3.a is applied, 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. 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.

SR 3.0.3.a may be applied if it has been discovered that an SR (or a portion of an SR) has never been performed provided that there is a reasonable expectation that the associated equipment is OPERABLE or that variables are within limit, and that it is expected that the SR will be met when performed. An example would be a relay contact that has never been tested in accordance with a particular SR, but the adjacent, physically connected relay contacts have been tested, the relay contacts have been tested by another SR, or historical operation of the associated equipment would have indicated a failure of the relay contact.

SR 3.0.3.b applies when it is discovered that it will not be possible to perform a Surveillance within its specified Frequency due to conditions that prohibit the performance of the SR but do not render the SR not met. It may not be possible to perform a Surveillance due to failure of the equipment needed to perform the Surveillance (such as test equipment) or failure of equipment needed to obtain the information or establish the conditions to perform the test (such as failure of a valve in a test line). In order for SR 3.0.3.b to be applied, the Frequency of the SR (including the allowance of SR 3.0.2) must not be expired. If SR 3.0.3.b is applied, then compliance with the requirement to declare the LCO not met may be delayed, from the time of the Surveillance is due (including the allowance of SR 3.0.2), up to 24 hours or up to the limit of the specified Frequency, whichever is greater. 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 the Surveillance Frequency expires in accordance with SR 3.0.2, and not at the time that it is discovered that the SR cannot be performed.

In order to apply SR 3.0.3.a or SR 3.0.3.b, there must be reasonable assurance that the Surveillance, when performed, will be met.

BASES

SR 3.0.3 (continued)

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

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel and necessary equipment, 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, or an Administrative Controls program, (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, or in accordance with the Inservice Testing Program, etc.) is discovered to not have been performed when specified or cannot be performed within the specified Frequency, SR 3.0.3.a and SR 3.0.3.b 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.~~

~~Use of SR 3.0.3.a or SR 3.0.3.b 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.a and SR 3.0.3.b 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 aggregate risk impacts, determination of risk management action

BASES

SR 3.0.3 (continued)

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 that are missed or cannot be performed within their specified Frequency 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.

SR 3.0.3.c

SR 3.0.3.c applies when it is discovered that a Surveillance is not met or will not be met. SR 3.0.1 states that failure to meet a Surveillance shall be failure to meet the LCO. However, in some circumstances it is possible for a Surveillance to not be met and the specified safety function for equipment to otherwise be met or variables to be within limit. For example, a Surveillance may require automatic actuation of a component. If the component is secured in the post-accident condition, and no subsequent change of state is required for accident mitigation, the associated system may be OPERABLE (i.e., capable of performing its specified safety function(s)). However, without the exception of SR 3.0.3.c, SR 3.0.1 would require declaring the LCO not met.

Application of SR 3.0.3.c requires a documented determination that the LCO is met. SR 3.0.3.c cannot be used until the documented determination is complete. The documented determination must be retained and be available for review. Therefore, if it is discovered that a Surveillance is not met, the LCO must be declared not met and the appropriate Conditions entered until the documented determination is completed and SR 3.0.3.c may be used. If the Surveillance will not be met following a preplanned, temporary change to the plant, the documented determination may be available prior to the SR not being met. In that case, SR 3.0.3.c may be used as soon as the SR is not met.

The documentation that the LCO is met must consider all aspects of meeting the LCO. If the LCO requires OPERABILITY, the documented determination must consider all aspects of OPERABILITY and all the specified safety functions, including those performed before and during an accident. The documented determination should consider the guidance in NRC Inspection Manual, Part 9900, "Operability Determinations and Functionality Assessments for Resolution of Degraded or Nonconforming Conditions Adverse to Quality or Safety."

If it is documented that the associated LCO is still met, then compliance with the requirement to declare the LCO not met may be delayed, from the time the Surveillance is not met up to the period of the specified Frequency or the next refueling outage (e.g., entry into the Applicability of the Specification following entry into Mode 6 (PWRs) or Mode 5 (BWRs), whichever is greater. This delay period provides adequate time to restore plant conditions so that the Surveillance may be met.

If at any time during the delay period it is determined that the LCO is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, requirements of regulations, or an Administrative Controls program, (e.g., prior to entering MODE 1 after each fuel loading, in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, or In accordance with the Inservice Testing Program, etc.) is not met, SR 3.0.3.c allows for the full delay period of up to the specified Frequency to perform the Surveillance or entry into the Applicability of the Specification following the next refueling outage, whichever is greater. However, since there is not a time interval specified, actions should be taken to meet the Surveillance at the first reasonable opportunity.

Use of SR 3.0.3.c is expected to be an infrequent occurrence. While the period of the specified Frequency or entry into the Applicability of the Specification following the next refueling outage, whichever is greater, is provided to meet the Surveillance, it is expected that actions should be taken to meet the Surveillance at the first reasonable opportunity. All Surveillances that are not met will be placed in the licensee's Corrective Action Program.

~~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, except as provided by SR 3.0.3.