

10 CFR 50.90 L-2009-033 February 16, 2009

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555-0001

Re: Turkey Point Units 3 and 4

Docket Nos. 50-250 and 50-251

License Amendment Request No. 195

Application to Delete Technical Specification 3/4.4.10, and to Implement a Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump

Flywheels Using the Consolidated Line Item Improvement Process

Pursuant to 10 CFR 50.90 and 10 CFR 50.91(a)(1), Florida Power and Light Company (FPL) requests approval of a change to Turkey Point Unit 3 and 4 Facility Operating Licenses DPR-31 and DPR-41, respectively. Attached for Nuclear Regulatory Commission review and approval is a proposed Technical Specification (TS) change to remove the structural integrity requirements contained in TS 3/4.4.10 and its associated Bases from the Turkey Point TSs. Removal of TS 3/4.4.10 is consistent with NUREG-1431 in that it does not meet the criteria of 10 CFR 50.36 for inclusion in the TSs.

The proposed amendment will also extend the reactor coolant pump (RCP) motor flywheel examination frequency from the currently approved 10-year inspection interval, to an interval not to exceed 20 years. This change is consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, Revision to RCP Flywheel Inspection Program (WCAP-15666). The availability of this TS improvement was announced in the Federal Register on October 22, 2003 (68 FR 60422) as part of the consolidated line item improvement process.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in Attachment 1. Proposed TS page markups are contained in Attachment 2.

The Turkey Point Plant Nuclear Safety Committee reviewed and approved the proposed amendment.

In accordance with 10 CFR 50.91(b)(1), a copy of the proposed amendment is being forwarded to the State Designee for the State of Florida.

ADOI NRR Florida Power and Light Company L-2009-033 License Amendment Request No. 195 Application to Delete Technical Specification 3/4.4.10 Page 2 of 2

There are no new commitments being made as a result of this request.

The proposed change is neither exigent nor emergency. Once approved, the amendment will be implemented within 60 days.

If you have any questions or require additional information, please contact Robert Tomonto at 305-246-7327.

I declare under penalty of perjury that the foregoing is true and correct.

Very truly yours,

Executed on

William Yerferson, Sr

Vice President – Turkey Point Nuclear Plant

Attachments: 1. Analysis of Proposed Technical Specification Change

2. Proposed Technical Specification Changes (mark-up)

cc: Regional Administrator, Region II, USNRC

Senior Resident Inspector, USNRC, Turkey Point Plant

USNRC Project Manager for Turkey Point

Mr. William Passetti, Florida Department of Health

Attachment 1

Florida Power and Light Company
Turkey Point Units 3 and 4
License Amendment Request No. 195
Florida Power & Light Company Letter L-2009-033

Application to Delete Technical Specification 3/4.4.10, and to Implement a Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump Flywheels Using the Consolidated Line Item Improvement Process

Analysis of Proposed Technical Specification Change

L-2009-033

Page 1 of 11

1.0 Description of Proposed Changes

1.1 Technical Specification 3/4.4.10

The proposed change removes the Turkey Point structural integrity requirements contained in Technical Specification (TS) 3/4.4.10 and the associated TS Bases from the TSs. The proposed change is consistent with NUREG-1431, Standard Technical Specifications Westinghouse Plants, Revision 3.0 (Reference 1).

1.2 Reactor Coolant Pump Flywheel Inspection Interval

The change also relocates the reactor coolant pump (RCP) flywheel inspection requirements in Surveillance Requirement (SR) 4.4.10 to SR 4.0.5 and revises the RCP flywheel inspection interval from 10 years to 20 years. The RCP flywheel inspection interval change is consistent with Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, Revision to RCP Flywheel Inspection Program (WCAP-15666). The availability of this TS improvement was announced in the Federal Register on October 22, 2003 (68 FR 60422) as part of the consolidated line item improvement process (CLIIP).

2.0 Proposed Change

The proposed changes to the Turkey Point TSs are as follows:

- TS Limiting Condition for Operation (LCO) 3.4.10, Structural Integrity, including its associated actions and SR 4.4.10 would be removed from the Turkey Point TSs.
- The RCP flywheel inspection requirements in SR 4.4.10 would be relocated to SR 4.0.5. Since the requirements of SR 4.4.10 include the requirements of SR 4.0.5 with the addition of the RCP flywheel inspection requirements, relocating the RCP flywheel inspection requirements to SR 4.0.5 does not revise any current SRs, and is therefore administrative in nature and is not discussed further in this application. The prescribed inspection methods are unchanged and are as provided in TSTF 421. A revision to the inspection interval is discussed next.
- Consistent with the NRC-approved TSTF-421, the proposed TS change includes the following revision to the relocated requirement for RCP flywheel inspections:

The examination interval for the RCP flywheels is changed from 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI to 20 year intervals.

Page 2 of 11

The relocated RCP flywheel inspection requirement with revised interval would be as follows:

Each reactor coolant pump flywheel shall be inspected at least once every 20 years, by either conducting an in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius, or conduct a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the disassembled flywheel.

• The page on which TS 3/4.4.10 is currently located would be retained but would contain a notation that specification number 3/4.4.10 is not used. This portion of the change is administrative in nature and is not discussed further in this application.

The Bases for TS 3/4.4.10 will be deleted and the Bases revised to address the change in the RCP flywheel inspection interval. These changes will be performed under the Turkey Point TS Bases Control Program and are not included in this application.

3.0 Background

3.1 Technical Specification 3/4.4.10

The purpose of TS 3/4.4.10, Structural Integrity, is to specify the requirements for maintaining the structural integrity of ASME Code Class 1, 2 and 3 components. This specification was originally intended to support assurance that structural integrity and operational readiness of these components are maintained at an acceptable level throughout the life of the facility. The specification is applicable in all operational modes. However, the specification does not provide actions for plant shutdown if its LCO is not met. This is because the specification addresses the passive pressure boundary function of American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class 1, 2 and 3 components as established by compliance with the Inservice Inspection (ISI) program. The ISI program is required pursuant to 10 CFR 50.55a, Codes and Standards (Reference 2) and SR 4.0.5. This TS does not fulfill any of the criteria of 10 CFR 50.36(c)(2)(ii) (Reference 3) for retention in the TSs.

Maintaining a program-type requirement within an LCO creates significant interpretation issues for Operations personnel. The structural integrity TS was part of the original TSs and, therefore, no basis history is available regarding its intent. However, TS 3/4.4.10 appears to have been included to help ensure that plant heatup and startup would not occur until all required portions of applicable systems were verified to meet ISI acceptance criteria following inspections performed during a plant outage (normally performed during refueling outages). Meeting this acceptance criteria

Page 3 of 11

helps ensure the integrity of applicable systems during all modes of operation, including accident events. For instance, the RCS pressure boundary is purposely breached during Mode 5 and 6 operations to support plant outage activities and such openings are not historically considered a violation of TS 3/4.4.10. Furthermore, TS 3/4.4.10 contains no actions suggesting it was designed to accommodate integrity concerns once plant heatup has commenced. Structural integrity ISI activities are performed only during plant outages when conditions exist that permit access to the applicable systems and are not monitored or controlled through application of the ISI program during the operational cycle. For example, other TSs are designed to monitor the structural integrity of the RCS during operation and provide actions to shutdown the unit if compliance is not maintained. RCS heatup and cooldown rates (TSs 3.4.9.1 and 3.4.9.2), and the overpressure mitigation system (TS 3.4.9.3) protect against applying undue stresses as a result of pressure/temperature transients on RCS components and piping. RCS leakage TSs (3.4.6.1 and 3.4.6.2) provide a means of protecting the RCS integrity by detecting and monitoring leakage. Therefore, it is not necessary to apply TS 3/4.4.10 when integrity issues become evident during plant operation above cold shutdown. Because TS 3/4.4.10 is redundant to other regulation, it is acceptable to remove the TS 3/4.4.10 requirements from the TSs.

Removal of this specification does not reduce the controls that are necessary to ensure compliance with the ASME Code. Structural integrity is maintained by compliance with 10 CFR 50.55a as implemented through the Turkey Point ISI program required by TS 4.0.5, as well as by compliance with TSs 3.4.6.1, 3.4.6.2, 3.4.9.1, 3.4.9.2 and 3.4.9.3 for the RCS.

3.2 Reactor Coolant Pump Flywheel Inspection Interval

The background for the application to revise the RCP flywheel inspection interval is adequately addressed by the Nuclear Regulatory Commission (NRC or Commission) Notice of Availability published on October 22, 2003 (68 FR 60422) (Reference 4), NRC Notice for Comment published on June 24, 2003 (68 FR 37590) (Reference 5), TSTF-421 (Reference 6), WCAP-15666, Extension of Reactor Coolant Pump Motor Flywheel Examination (Reference 7), and the related NRC safety evaluation (SE) dated May 5, 2003 (Reference 8).

Page 4 of 11

4.0 Regulatory Analysis

4.1 Technical Specification 3/4.4.10

Section 182a of the Atomic Energy Act, as amended (the Act), requires applicants for nuclear power plant operating licenses to incorporate TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in Title 10 of the Code of Federal Regulations (10 CFR) 50.36. That regulation requires that the TSs include items in five categories, including: (1) safety limits, limiting safety system settings and limiting control settings, (2) limiting conditions for operation, (3) surveillance requirements, (4) design features, and (5) administrative controls.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TSs. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TSs, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

[T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TSs; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents.

Page 5 of 11

The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are stated as follows:

- (1) Installed instrumentation that is used to detect, and indicate in a control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- (2) A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; and
- (4) A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As a result, existing LCO requirements that fall within or satisfy any of the criteria in 10 CFR 50.36(c)(2)(ii) must be retained in the TSs while those LCO requirements that do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

4.2 Reactor Coolant Pump Flywheel Inspection Interval

The applicable regulatory requirements and guidance associated with the application to revise the RCP flywheel inspection interval are adequately addressed by the NRC Notice of Availability published on October 22, 2003 (68 FR 60422), NRC Notice for Comment published on June 24, 2003 (68 FR 37590), TSTF-421, WCAP-15666, and the related NRC safety evaluation.

5.0 Technical Analysis

5.1 Technical Specification 3/4.4.10

The purpose of TS 3/4.4.10, Structural Integrity, is to specify the requirements of maintaining the structural integrity of ASME Code Class 1, 2 and 3 components. However, this is redundant to and does not contain the detail of the requirements contained within 10 CFR 50.55a. 10 CFR 50.36(c)(2)(ii) states that a TS LCO of a

Page 6 of 11

nuclear reactor must be established for each item meeting one or more of the following criteria:

Criterion 1 Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

TS 3/4.4.10 is not applicable to installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the RCS. Structural Integrity TS 3/4.4.10 does not meet Criterion 1.

Criterion 2 A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

TS 3/4.4.10 is not applicable to a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. Although the specification is related to the integrity of applicable systems, compliance is maintained by meeting the requirements of 10 CFR 50.55a through implementation of the Turkey Point ISI program required by TS 4.0.5 and is not specifically monitored or controlled during plant operation. Structural Integrity TS 3/4.4.10 does not meet Criterion 2.

Criterion 3 A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

No specific TS-related structure, system, or component (SSC) is being revised or removed from the TSs. Each TS SSC must continue to meet the requirements of 10 CFR 50.55a as implemented through the Turkey Point ISI program required by TS 4.0.5. Structural Integrity TS 3/4.4.10 does not meet Criterion 3.

Page 7 of 11

Criterion 4 A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As stated above, no specific TS-related structure, system, or component (SSC) is being revised or removed from the TSs. Each TS SSC must continue to meet the requirements of 10 CFR 50.55a as implemented through the Turkey Point ISI program required by TS 4.0.5. Structural Integrity TS 3/4.4.10 does not meet Criterion 4.

The scope of this specification has been evaluated against the criteria of 10 CFR 50.36(c)(2)(ii) and none of these criteria require that the structural integrity controls specified in TS 3/4.4.10 are appropriate for retention in the Turkey Point TSs. This conclusion is consistent with NUREG-1431, Standard Technical Specifications Westinghouse plants, Revision 3.0.

Based on the above discussion, removal of structural integrity requirements contained in TS 3/4.4.10 from the TSs is acceptable.

5.2 Reactor Coolant Pump Flywheel Inspection Interval

FPL has reviewed the model safety evaluation published on June 24, 2003 (68 FR 37590), and verified its applicability as part of the CLIIP. This verification included a review of the NRC staff's model SE, as well as the information provided to support TSTF-421 (including WCAP-15666 and the related SE dated May 5, 2003). FPL has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to Turkey Point Unit Nos. 3 and 4, and justify this amendment for the incorporation of the changes to the Turkey Point TS to revise the RCP flywheel inspection interval.

6.0 Determination of No Significant Hazards Consideration

6.1 Technical Specification 3/4.4.10

FPL is proposing that the Turkey Point Operating License be amended to revise the TS requirements for structural integrity. The proposed changes will remove Structural Integrity TS 3/4.4.10 from the TSs. This specification is redundant to ASME Code compliance as required by 10 CFR 50.55a and specified in TS 4.0.5. The proposed

Page 8 of 11

change is consistent with NUREG-1431, Standard Technical Specifications Westinghouse Plants, Revision 3.0.

FPL has evaluated whether or not a significant hazards consideration is involved with the proposed amendment 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 to remove structural integrity controls from the TSs does not impact any mitigation equipment or the ability of the RCS pressure boundary to fulfill any required safety function. The proposed change will continue to ensure the requirements of 10 CFR 50.55a are maintained as specified in TS 4.0.5. Since no accident mitigation or initiators are impacted by this change, no design basis accidents are affected.

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

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

Response:

No. The proposed change will not alter the plant configuration or change the manner in which the plant is operated. Structural integrity will continue to be maintained as required by 10 CFR 50.55a and specified in TS 4.0.5 No new failure modes are being introduced by the proposed change.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response:

Page 9 of 11

No. Removal of TS 3/4.4.10 from the TSs does not reduce the controls that are required to maintain the structural integrity of ASME Code Class 1, 2, or 3 components. No safety margins are impacted due to the proposed change.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, FPL concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified for the removal of TS 3/4.4.10.

6.2 Reactor Coolant Pump Flywheel Inspection Interval

FPL has reviewed the proposed no significant hazards consideration determination published on June 24, 2003 (68 FR 37590) as part of the CLIIP for revising the RCP flywheel inspection interval. FPL has concluded that the proposed determination presented in the notice is applicable to Turkey Point and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

7.0 Environmental Considerations

7.1 Technical Specification 3/4.4.10

The proposed amendment 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 amendment 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 amendment.

7.2 Reactor Coolant Pump Flywheel Inspection Interval

FPL has reviewed the environmental evaluation included in the model SE published on June 24, 2003 (68 FR 37590) as part of the CLIIP for revising the RCP flywheel inspection interval. FPL has concluded that the staff's findings presented in that evaluation are applicable to Turkey Point and the evaluation is hereby incorporated by reference for this application.

Page 10 of 11

8.0 Precedence

8.1 Technical Specification 3/4.4.10

The proposed change to remove TS 3/4.4.10 from the TSs is consistent with NUREG-1431, Standard Technical Specifications Westinghouse Plants, Revision 3.0 and is similar to that issued for the Millstone Nuclear Power Station, Unit No. 2 in Amendment 264 dated February 1, 2002, the Waterford Steam Electric Station, Unit 3 in Amendment 189 dated September 22, 2003, and Arkansas Nuclear One, Unit No. 2 in Amendment 270 dated March 1, 2007.

8.2 Reactor Coolant Pump Flywheel Inspection Interval

This application is also being made in accordance with the CLIIP for revising the RCP flywheel inspection interval. FPL is not proposing variations or deviations from the TS changes described in TSTF-421 or the NRC staff's model SE published on June 24, 2003 (68 FR 37590).

9.0 References

- 1. NUREG 1431, Standard Technical Specifications Westinghouse Plants, Revision 3.0
- 2. 10 CFR 50.55a, Codes and Standards
- 3. 10 CFR 50.36, Technical Specifications
- 4. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published October 22, 2003 (68 FR 60422).
- 5. Federal Register Notice: Notice of Opportunity to Comment on Model Safety Evaluation on Technical Specification Improvement Regarding Extension of Reactor Coolant Pump Motor Flywheel Examination for Westinghouse Plants Using the Consolidated Line Item Improvement Process, published June 24, 2003 (68 FR 37590).
- 6. Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-421, Revision to RCP Flywheel Inspection Program (WCAP-15666), Revision 0, November 2001.

L-2009-033

Page 11 of 11

- 7. WCAP-15666, Extension of Reactor Coolant Pump Motor Flywheel Examination, July 2001.
- 8. NRC letter dated May 5, 2003, from H. Berkow to R. Bryan (WOG) transmitting Safety Evaluation of WCAP-15666.

Attachment 2

Florida Power and Light Company
Turkey Point Units 3 and 4
License Amendment Request No. 195
Florida Power & Light Company Letter L-2009-033

Application to Delete Technical Specification 3/4.4.10, and to Implement a Technical Specification Improvement to Extend the Inspection Interval for Reactor Coolant Pump Flywheels Using the Consolidated Line Item Improvement Process

Proposed Technical Specification Changes (mark-up)

<u>INDEX</u>

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

SECTION		<u>PAGE</u>
3/4.4.9	PRESSURE/TEMPERATURE LIMITS Reactor Coolant System	3/4 4-30
FIGURE 3.4-2	TURKEY POINT UNITS 3&4 REACTOR COOLANT SYSTEM HEATUP LIMITATIONS APPLICABLE UP TO 32 EFPY	3/4 4-31
FIGURE 3.4.3	TURKEY POINT UNITS 3&4 REACTOR COOLANT SYSTEM COOLDOWN LIMITATIONS (100°F/hr) APPLICABLE UP TO 32 EFPY	3/4 4-32
TABLE 3.4.5	REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM-WITHDRAWAL SCHEDULE Pressurizer Overpressure Mitigating Systems	3/4 4-35
3/4.4.10	(DELETED) STRUCTURAL INTEGRITY	3/4 4-38
3/4.4.11	REACTOR COOLANT SYSTEM VENTS	3/4 4-39
3/4.5 EMERGENCY CORE COOLING SYSTEMS		
3/4.5.1	ACCUMULATORS	3/4 5-1
3/4/5.2	ECCS SUBSYSTEMS - Tavg GREATER THAN OR EQUAL TO 350°F	3/4 5-3
FIGURE 3.5-1	RHR PUMP CURVE	3/4 5-6
3/4.5.3	ECCS SUBSYSTEMS - T _{avg} LESS THAN 350°F	3/4 5-9
3/4.5.4	REFUELING WATER STORAGE TANK	3/4 5-10

APPLICABILITY

SURVEILLANCE REQUIREMENTS (CONTINUED)

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

ASME Boiler and Pressure Vessel Code and the ASME OM Code and applicable Addenda terminology for inservice inspection and testing activities

Weekly
Monthly
Quarterly or every 3 months
Semiannually or every 6 months
Every 9 months
Yearly or annually
Biennially or every 2 years

Required frequencies for performing inservice inspection and testing activities

At least once per 7 days
At least once per 31 days
At least once per 92 days
At least once per 184 days
At least once per 276 days
At least once per 366 days
At least once per 731 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code or the ASME OM Code shall be construed to supersede the requirements of any Technical Specification.

4.0.6 Surveillance Requirements shall apply to each unit individually unless otherwise indicated as stated in Specification 3.0.5 for individual specifications or whenever certain portions of a specification contain surveillance parameters different for each unit, which will be identified in parentheses, footnotes or body of the requirement.

Each reactor coolant pump flywheel shall be inspected at least once every 20 years, by either conducting an in-place ultrasonic examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius, or conduct a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the dissassembled flywheel.



LIMITING CONDITION FOR OPERATION

-3.4.10 The structural integrity of ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.10:

APPLICABILITY: ALL MODES

ACTION:

- -a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.
- -b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above-requirements, restore the structural integrity of the affected component(s) to within its limit or-isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F:
- c. With the structural integrity of any ASME Code Class-3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

SURVEILLANCE REQUIREMENTS

-4.4.10 In addition to the requirements of Specification 4.0.5, each reactor coolant pump flywhool shall be inspected at least once every 10 years, by either conducting an in-place ultrasonic examination over the volume from the inner bore of the flywhool to the circle of one-half the outer radius, or conduct a surface examination (magnetic particle and/or liquid penetrant) of exposed surfaces of the diseaseembled flywhool.