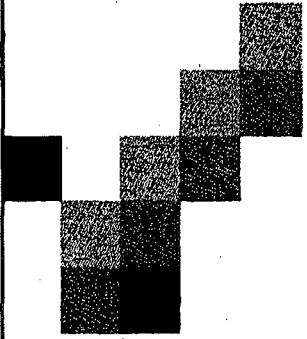


Enclosure 4
TSTF Presentation Handout
Meeting Summary of the January 27 & 28 Meeting with
NRC/TSTF.
Dated March 9, 2009

Improved Technical Specifications



Technical Specifications Workshop

Technical Specifications Rules of Usage

Technical Specifications Case Studies

AGENDA

- Technical Specification Structure and Usage
- Technical Specification Bases
- ITS Section 3.0
- ITS Chapter 1

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SPECIFICATION FORMAT

- ITS Chapter 3 with exception of Section 3.0
- Refer to TS 3.6.2, "Containment Airlock" for discussion

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Limiting Condition for Operation

- The lowest functional capability or performance level of equipment required for safe operation of the facility (from 10 CFR 50.36)
 - Specifies the minimum level of equipment that must be OPERABLE to operate in a MODE or other Condition
 - Also identifies process parameters and specifies Allowable Values

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Required Actions

- Remedial Actions that must be performed when an LCO is not met to assure continued safe operation (from 10 CFR 50.36)
 - ▶ Specifies actions that restore an acceptable level of safety and/or
 - ▶ Provides a limited time period (AOT) for continued operation with a degraded condition

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ACTION Statement in Prose Writing

- With one containment airlock door inoperable, close and lock the OPERABLE door within 24 hours.
- Otherwise, be in Hot Standby in 6 hours and Cold Shutdown in the following 30 hours.

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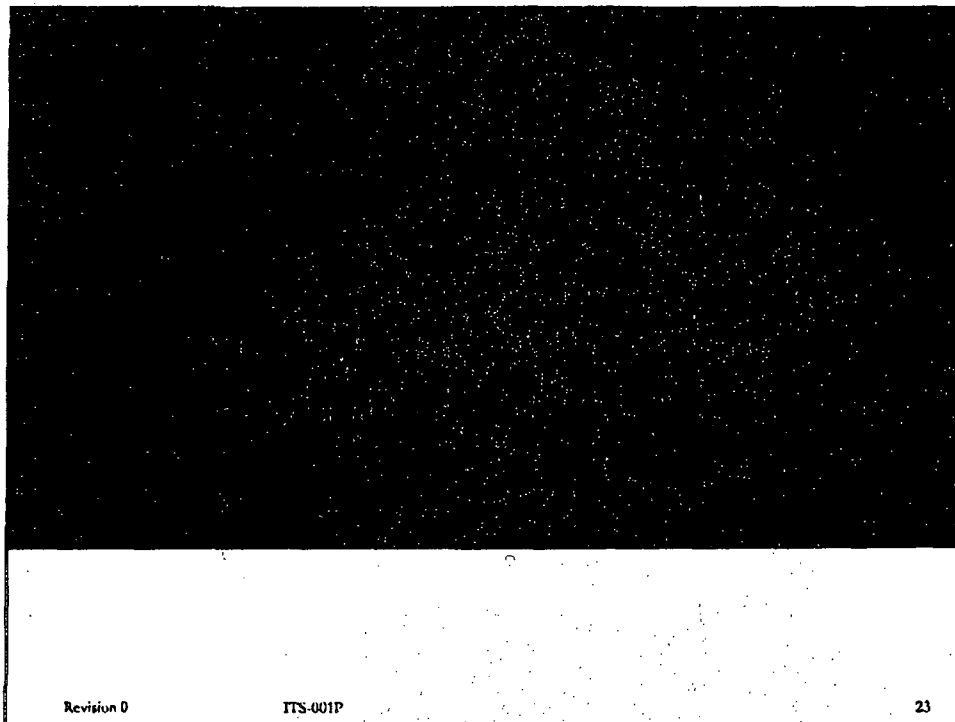
Surveillance Requirements

- 10CFR50.36 identifies Surveillance Requirements as “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 the safety limits, and that the LCOs will be met.”

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Case Study 1

Structure of TS for Ultrasonic Flow Meters

Technical Specifications Bases

- ◆ Compared to the previous standard Bases, the ITS Bases have been greatly expanded
 - ▶ Provides sufficient information to make decisions with respect to the requirements of an LCO or surveillance
 - ▶ Provides a more useful tool for users

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Catawba Emergency Technical Specification Change **CASE STUDY 2**

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Technical Specification Bases (continued)

- ◆ Bases are not a part of Technical Specifications (i.e., Appendix A to plant license)
 - ▶ Changing the Bases will not necessarily require a change to the Technical Specifications
 - ▶ Changes to the Bases are made via the Technical Specification Bases Control Program which includes the 10CFR50.59 process

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Case Study 3

Rejection of TSTF-495, Bases Change
to Address GE Part 21 SC05-03

LCO Use and Application

- LCOs 3.0.1 through 3.0.9 are general rules applicable to all Chapter 3.0 Technical Specifications
- Apply at all times to Chapter 3 LCOs and SRs, unless otherwise stated
- Not applicable to Chapter 5 unless specifically stated

LCO 3.0.1

- All requirements of an LCO must be met anytime the LCO is Applicable, except as provided by LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.
- LCO requirements do not have to be met when the LCO is not applicable.

LCO 3.0.2

- The Required Actions for a Condition are required to be met upon discovery of a failure to meet the LCO
- Five important application attributes apply

LCO 3.0.2 - Attribute 1

- For Tech Spec purposes, ACTIONS of a Technical Specification are not required until the discovery of a failure to meet the LCO.

LCO 3.0.2 - Attribute 2

- Plant operation may continue if an LCO is not met as long as the requirements of the ACTIONS are met.

‣ Compliance with the ACTIONS also constitutes compliance with the Specification.

If the Required Action allows unlimited continued operation, performance of the Required Action establishes an acceptable level of safety.

LCO 3.0.2 - Attribute 3

- If a Condition has been entered but the requirements of the LCO are met or no longer applicable before expiration of the Completion Time, completion of the Required Action is not required, unless otherwise stated

LCO 3.0.2 - Attribute 4

- "Unless otherwise stated" refers to instances that require completion of a Required Action even if the affected equipment is declared OPERABLE
- **EXAMPLE - RCS Pressure and Temperature (P/T) Limits**

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LCO 3.0.2 - Attribute 5

- Required Actions within a Condition become applicable upon entry into the associated TS Condition.
 - Applies even if the ACTIONS are entered intentionally (such as for SR performance)
 - Intentional ACTION entry is not intended to be used for operational convenience

Clarification of "operational convenience" as stated in ISTS Bases?

CASE STUDY 4

LCO 3.0.3

☐ When a LCO is not met and a plant condition exists that is not addressed by the associated Conditions or if specifically directed by the Required Actions

▸ the plant must be placed in a MODE or condition where the LCO is no longer applicable

☐ Also required if Completion Times are not met and no other ACTIONS apply.

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LCO 3.0.4

◆ Prevents entry into a MODE or other specified condition unless all applicable LCOs are met without reliance on ACTIONS

◆ Does **NOT** prevent MODE changes required to comply with Required Actions or for unit shutdown

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LCO 3.0.4 Allowances

- Conditions in which completion of a Required Action allows continued operation for an unlimited period of time
- ***Example: Containment Airlock Specification***
 - Operation can continue indefinitely while in Condition A

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LCO 3.0.4 Allowances

- Where a limited Completion Time is provided to allow restoration of inoperable equipment (AOT), a risk assessment may be completed and the risk managed via the Plant's Configuration Risk Management Program.

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LCO 3.0.4 Allowances

- Sometimes a specific LCO 3.0.4.c allowance is provided where a limited Completion Time is provided to allow restoration of inoperable equipment
- **Example: RCS Specific Activity Specification**

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Palisades use of LCO 3.0.4 **CASE STUDY 5**

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LCO 3.0.5

- In some cases inoperable equipment must be returned to service to
 - Allow testing the OPERABILITY of redundant equipment or
 - Test the inoperable equipment following repair to determine operability
- Provides exception to LCO 3.0.2

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EXAMPLES FOR LCO 3.0.5

- Opening an automatic isolation valve closed by a Required Action to measure its stroke time
- Restoration of a logic channel from the tripped condition to allow testing of another channel in the same trip system

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	<p>Case Study 6</p> <p>ANO Use of LCO 3.0.5</p> <p>Revision 0 ITS-001P 58</p>

	<p>LCO 3.0.6</p>
	<p>□ If a support system with a separate LCO is declared inoperable and affects OPERABILITY of supported equipment, the supported equipment is considered inoperable.</p> <p>Revision 0 ITS-001P 60</p>

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LCO 3.0.6 (continued)

- LCO 3.0.6 provides an exception to LCO 3.0.2 for supported systems that have individual LCOs specified in TS
- Eliminates confusion and unnecessary actions associated with multiple LCO ACTIONS due to entering potentially numerous Technical Specifications.

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LCO 3.0.6 (continued)

- Necessary Required Actions are specified in the support system LCO
- Required Actions for the supported system do **not** have to be entered, even though the system is *inoperable*

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LCO 3.0.7

- ❑ Establishes ability to modify normal TS requirements to conduct Physics and other required special tests
 - ▶ Tests unable to perform while complying with normal TS requirements
 - ▶ Compliance is Optional and only needs to be complied with during conduct of the test
 - ▶ If possible, may perform the test under normal LCOs

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LCO 3.0.8

- ⊙ Delays the requirement to declare the LCO not met when solely for one ore more non-functional snubbers if risk is assessed and managed
 - one train or subsystem of a multiple train system restoration time is 72 hours
 - single train or subsystem restoration time is 72 hours
 - more than one train or subsystem of a multiple train or subsystem restoration time is 12 hours

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LCO 3.0.9 (TSTF-427)

- Delays the requirement to declare the LCO not met when one or more required barriers are unable to perform their related support function if risk is assessed and managed.

Surveillance Requirements

- ☐ SR 3.0.1 through SR 3.0.4

Provide the general rules
applicable to all surveillance
requirements

Improved Technical Specifications

SR 3.0.1

- ☐ If an LCO is applicable, the associated SRs are required to be met
- ☐ Failure to meet a required SR between required performances constitutes a failure to meet the LCO

SR 3.0.1 (continued)

- Equipment is assumed to be OPERABLE if its SRs are met
- Equipment is inoperable if
 - It is known to be inoperable, even if the SRs are current
 - An SR is known not to be met, even if the SR is between a required performance interval

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NCV on Structural Integrity Technical Specification

CASE STUDY 7

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SR 3.0.2

- ❑ Permits a 25% extension to a specified frequency
 - Facilitates scheduling of unforeseen problems that prevent performance during the normal interval
 - Not intended to be used to routinely extend the performance interval
 - Exceptions to SR 3.0.2 are noted in the individual specification

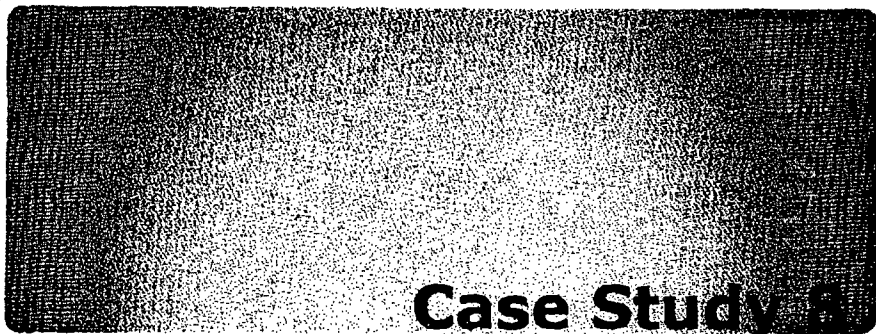
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SR 3.0.2 for Required Actions

- ☐ SR 3.0.2 is applicable for Required Actions that have a periodic performance except
 - ▶ The initial Completion Time of a periodic action specified in a Required Action (subsequent intervals may be extended)

SR 3.0.3

- ☐ Provides operational relief when a surveillance is missed
 - ▶ Not required to immediately declare inoperable due to a missed SR
 - ▶ Inadequate testing procedures that do not meet the required SR criteria constitutes a missed SR
 - (i.e., performing an inadequate plant test procedure does not necessarily constitute SR performance)



Case Study 8
Applicability of SR 3.0.3 to SRs That
Have Never Been Performed

Revision 0 ITS-001P 83

ITS-001P Revision 0

River Bend Shutdown as an Alternative
Action

CASE STUDY 9

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Perry Inability to Follow RHR-SDC Required
Actions

CASE STUDY 10

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