

**Summary of Changes  
ITS Section 3.0**

<b>Change Description</b>	<b>Affected Pages</b>
The changes described in the KPS response to question ALK-009 have been made. This change corrects a typographical error in DOC A02.	Page 13
The changes described in the KPS response to question ALK-010 have been made. This change corrects typographical errors in DOC A03.	Page 14
The changes described in the KPS response to question ALK-014 have been made. This change deletes a JFD (JFD 9) that is not used.	Page 54
The changes described in the KPS response to question ALK-015 have been made. This change reclassifies DOC M01 to an L DOC (related to LCO 3.0.8 change).	Pages 9, 12, 19, 24, 25, 65, 66, 67, and 68
The changes described in the KPS response to question ALK-016 have been made. This change removes a reference to a TSTF in JFD 7.	Page 53

# **ATTACHMENT 1**

## **VOLUME 5**

### **KEWAUNEE POWER STATION IMPROVED TECHNICAL SPECIFICATIONS CONVERSION**

#### **ITS SECTION 3.0 LCO AND SR APPLICABILITY**

##### **Revision 1**

## **LIST OF ATTACHMENTS**

- 1. ITS Section 3.0**

**ATTACHMENT 1**

**ITS Section 3.0, LCO and SR Applicability**

**Current Technical Specification (CTS) Markup  
and Discussion of Changes (DOCs)**

3.0 LIMITING CONDITIONS FOR OPERATION

(LCO) APPLICABILITY

APPLICABILITY

LCOs shall be met

specified

LCO 3.0.1, LCO 3.0.2

a. Compliance with the LIMITING CONDITIONS FOR OPERATION contained in the succeeding TSs is required during the operational MODES or other conditions specified therein; except that upon failure to meet the LIMITING CONDITIONS FOR OPERATION, the associated ACTION requirements shall be met.

A02

LCO 3.0.2

b. Noncompliance with a TS shall exist when the requirements of the LIMITING CONDITIONS FOR OPERATION and associated ACTION requirements are not met within the specified time intervals. If the LIMITING CONDITIONS FOR OPERATION is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

A02

LCO 3.0.3

c. Standard Shutdown Sequence

INSERT 2

an LCO

S

When a LIMITING CONDITION FOR OPERATION is not met, and a plant shutdown is required except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the Specification does not apply by placing it, as applicable, in:

A03

A04

INSERT 3

a. 1. At least HOT STANDBY within the next 6 hours,

MODE 3

7

b. 2. At least HOT SHUTDOWN within the following 6 hours, and

MODE 4

13

c. 3. At least COLD SHUTDOWN within the subsequent 36 hours.

MODE 5

7

M03

Exceptions to these requirements are stated in the individual TSs.

Specifications

this Specification

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the ACTIONS required by LCO 3.0.c. is not required.

3

This TS is not applicable when the plant is in COLD or REFUELING SHUTDOWN.

A05

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

INSERT 4

L01

INSERT 5

L02

INSERT 6

A06

INSERT 7

A07

INSERT 8

M01

A02

**INSERT 1**

in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8.

A02 A03

**INSERT 2**

Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

M03 A04

**INSERT 3**

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

A04

M03

**INSERT 4**

LCO 3.0.4

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

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

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

**INSERT 5**

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

A06

**INSERT 6**

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.13, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

A07

**INSERT 7**

LCO 3.0.7

Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

L04

**INSERT 8**

## LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 24 hours.

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

A01

(SR) APPLICABILITY

3 4.0

### SURVEILLANCE REQUIREMENTS

#### APPLICABILITY

SRs

SR 3.0.1

a. Surveillance requirements shall be met during the operational MODES or other conditions specified for individual LIMITING CONDITIONS FOR OPERATION (LCO) unless otherwise stated in an individual surveillance requirement. Failure to meet a surveillance requirement, whether such failure is experienced during the performance of the surveillance or between performances of the surveillances, shall be failure to meet the OPERABILITY requirements for the LCO. Failure to perform a surveillance within the allowed surveillance interval, defined by TS 4.0.b, shall be a failure to meet the OPERABILITY requirements for the LCO except as provided in TS 4.0.c. Surveillance requirements do not have to be performed on inoperable equipment.

the SR

in the Applicability

specified Frequency

s,

A08

or variables outside specified limits

SR 3.0.3

SR 3.0.2

b. Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.

L03

INSERT 10

A09

SR 3.0.3

c. If it is discovered that a surveillance was not performed within its allowed surveillance interval, then compliance with the requirement to declare the OPERABILITY requirements for the LCO not met may be delayed from the time of discovery up to 24 hours, or up to the limit of the allowed surveillance interval, 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.

specified Frequency

M02

A01

If the surveillance is not performed within the delay period, the OPERABILITY requirements for the LCO must immediately be declared not met, and the applicable conditions(s) must be entered.

When the surveillance is performed within the delay period and the surveillance is not met, the OPERABILITY requirements for the LCO must immediately be declared not met, and the applicable conditions(s) must be entered.

SR 3.0.4

d. Entry into an operational MODE or other specified condition shall not be made unless the surveillance requirement(s) associated with a LIMITING CONDITION FOR OPERATION have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to operational MODES as required to comply with action requirements.

when

LCO's

met

in the Applicability of an LCO

only

INSERT 11

A10

L01

A10

Exceptions to these requirements are stated in the individual Technical Specifications.

**INSERT 10**

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.

A09

For Frequencies specified as "once," the above interval extension does not apply.

M02

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

L03

Exceptions to this Specification are stated in the individual Specifications.

A09

**INSERT 11**

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.

L01

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

A10

**3.14 SHOCK SUPPRESSORS (SNUBBERS)****APPLICABILITY**

Applies to the OPERABILITY of shock suppressors which are related to plant safety.

**OBJECTIVE**

To ensure that shock suppressors, which are used to restrain safety-related piping under dynamic load conditions, are functional during reactor operation.

( See CTS  
3.14 )

**SPECIFICATION**

a. The reactor shall not be made critical unless all safety-related shock suppressors are OPERABLE except as noted in 3.14.b.

LCO 3.0.8

b. During power operation or recovery from inadvertent trip, if any safety-related shock suppressor is found inoperable one of the following actions shall be taken within 72 hours:

1. The inoperable shock suppressor shall be restored to an OPERABLE condition or replaced with a spare shock suppressor of similar specifications; or
2. The fluid line restrained by the inoperable shock suppressor shall, if feasible, be isolated from other safety-related systems if otherwise permitted by the TS and thereafter operation may continue subject to any limitations by the TS for that fluid line; or
3. Actions shall be initiated to shut down the reactor and the reactor shall be in a HOT SHUTDOWN condition within 36 hours.

L04

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

ADMINISTRATIVE CHANGES

A01 In the conversion of the Kewaunee Power Station (KPS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 3.0, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A02 CTS 3.0.a states, "Compliance with the LIMITING CONDITIONS FOR OPERATION contained in the succeeding TSs is required during the operational MODES or other conditions specified therein; except that upon failure to meet the LIMITING CONDITIONS FOR OPERATION, the associated ACTION requirements shall be met." ITS 3.0.1 states, "LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8." This results in several changes to the CTS.

- Certain phrases are revised to be consistent with the equivalent phrase used in the ITS. Specifically, "operational MODES or other conditions specified therein" is changed to "MODES or other specified conditions in the Applicability" to be consistent with the ITS definition of MODE and the terminology used in the ITS.

These changes are acceptable because they result in no change in the intent or application of the Technical Specifications, but merely reflect editorial preferences used in the ITS.

- The phrase "Compliance with the LIMITING CONDITIONS FOR OPERATION contained in the TS is required" is replaced with "LCOs shall be met." This change is made consistent with the ITS.

This change is acceptable because it is an editorial change that does not change the intent of the requirements.

- The phrase "except that upon failure to meet the LIMITING CONDITIONS FOR OPERATION, the associated ACTION requirements shall be met" is moved from CTS 3.0.a to ITS LCO 3.0.2, which states that upon discovery of failure to meet an LCO, the Required Actions of the associated Conditions shall be met.

The change is acceptable because moving this information within the Technical Specifications results in no change in the intent or application of ACTIONS.

- The phrase "except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8" is added in ITS LCO 3.0.1. ITS LCO 3.0.2 describes the appropriate actions to be taken when ITS LCO 3.0.1 is not met. ITS LCO 3.0.7 describes Test

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

Exceptions LCOs, which are exceptions to other LCOs. ITS LCO 3.0.8 addresses snubber inoperabilities, which is also an exception to other LCOs.

This change is acceptable because adding the exceptions for LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8 prevent a conflict within the Applicability section. This addition is needed for consistency in the ITS requirements and does not change the intent or application of the Technical Specifications.

These changes are designated administrative because they are editorial and result in no technical changes to the Technical Specifications.

A03 CTS 3.0.b states, "Noncompliance with a TS shall exist when the requirements of the LIMITING CONDITIONS FOR OPERATION and associated ACTION requirements are not met within the specified time intervals. If the LIMITING CONDITIONS FOR OPERATION is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required." ITS LCO 3.0.2 states "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated." This results in several changes to the CTS.

- CTS 3.0.b is revised to include an exception for LCO 3.0.6. LCO 3.0.6 is a new allowance that takes exception to the ITS LCO 3.0.2 requirement to take the associated ACTION requirements when a LIMITING CONDITION FOR OPERATION is not met. This exception is included in LCO 3.0.2 to avoid conflict between the applicability requirements.

This change is acceptable because it includes a reference to a new item in the ITS and results in no change to the CTS. Changes resulting from the incorporation of LCO 3.0.6 are discussed in Discussion of Change (DOC) A08.

- The second sentence of CTS LCO 3.0.b states, "If the LIMITING CONDITIONS FOR OPERATION is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required." The sentence is changed, in ITS LCO 3.0.2, to state "If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated."

This change is acceptable because, while worded differently, both the CTS and ITS state that ACTIONS do not have to be completed once the LCO is met or is no longer applicable. ITS LCO 3.0.2 also adds the phrase "unless otherwise stated." There are some ITS ACTIONS that must be completed, even if the LCO is met or is no longer applicable. This change is acceptable because it reflects a new feature in the ITS which does not exist in the CTS. The technical aspects of these changes are discussed in the appropriate ITS sections.

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

These changes are designated as administrative because they are editorial and do not result in technical changes to the Technical Specifications.

- A04 CTS LCO 3.0.c is applicable "When a LIMITING CONDITION FOR OPERATION is not met, and a plant shutdown is required except as provided in the associated ACTION requirements." ITS 3.0.3 expands those applicability requirements so that the requirement is applicable "When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS." This changes the CTS to add two new applicability conditions.

- ITS 3.0.3 is applicable when the LCO is not met and there is no applicable ACTION to be taken.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

- ITS LCO 3.0.3 is applicable when directed by the associated ACTIONS. The CTS and the ITS contain such requirements. Any Technical changes related to the directing LCO 3.0.3 entry in an ACTION will be discussed in the affected Technical Specifications.

This change is acceptable because it is consistent with the current understanding and application of CTS 3.0.3.

These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.

- A05 CTS 3.0.c states "This TS is not applicable when the plant is in COLD SHUTDOWN or REFUELING SHUTDOWN." ITS LCO 3.0.3 states "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4."

This change is acceptable because the change to CTS 3.0.c is editorial. The sentence "LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4" essentially provides the MODES the LCO is applicable to, in lieu of the MODES it is not applicable to. Thus CTS 3.0.c and ITS LCO 3.0.3 are effectively only applicable in MODES 1, 2, 3, and 4, and the change in the sentence merely reflects editorial preferences used in the ITS. This change is designated as administrative because there is no change in the intent or application of the CTS 3.0.c requirements.

- A06 ITS LCO 3.0.6 is added to the CTS to provide guidance regarding the appropriate ACTIONS to be taken when a single inoperability (a support system) also results in the inoperability of one or more related systems (supported system(s)). LCO 3.0.6 states "When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.13, "Safety Function

**DISCUSSION OF CHANGES  
ITS 3.0, LCO AND SR APPLICABILITY**

Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2. In the CTS, based on the intent and interpretation provided by the NRC over the years, there has been an ambiguous approach to the combined support/supported inoperability. Some of this history is summarized below:

- Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination) would indicate an intent/interpretation consistent with the proposed LCO 3.0.6, without the necessity of also requiring additional ACTIONS. That is, only the inoperable support system ACTIONS need to be taken.
- Guidance provided by the NRC in their April 10, 1980, letter to all Licensees, regarding the definition of OPERABILITY and its impact as a support system on the remainder of the CTS, would indicate a similar philosophy of not taking ACTIONS for the inoperable supported equipment. However, in this case, additional actions (similar to the proposed Safety Function Determination Program actions) were addressed and required.
- Generic Letter 91-18 provides an interpretation that inoperability, even as a result of a Technical Specification support system inoperability, requires all associated ACTIONS to be taken.
- Certain CTS contain ACTIONS such as "Declare the {supported system} inoperable and take the ACTIONS of {its Specification}." In many cases, the supported system would likely already be considered inoperable. The implication of this presentation is that the ACTIONS of the inoperable supported system would not have been taken without the specific direction to do so.

Considering the history of misunderstandings in this area, the WOG ISTS, NUREG-1431, Rev. 3 was developed with Industry input and approval of the NRC to include LCO 3.0.6 and new program, Specification 5.5.13, "Safety Function Determination Program (SFDP)." This change is acceptable since its function is to clarify existing ambiguities and to maintain actions within the realm of previous interpretations. This change is designated as administrative because it does not technically change the Technical Specifications.

- A07 ITS LCO 3.0.7 is added to the CTS. LCO 3.0.7 states "Test Exception LCO 3.1.8 allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a test

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Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications."

This change is acceptable because the CTS contain test exception specifications which allow certain LCOs to not be met for the purpose of special tests and operations. However, the CTS does not contain the equivalent of ITS LCO 3.0.7. As a result, there could be confusion regarding which LCOs are applicable during special test. LCO 3.0.7 was crafted to avoid that possible confusion. LCO 3.0.7 is consistent with the use and application of CTS test exception Specifications and does not provide any new restriction or allowance. This change is designated as administrative because it does not technically change the Technical Specifications.

- A08 CTS 4.0.a states "Surveillance requirements shall be met during the operational MODES or other conditions specified for individual LIMITING CONDITIONS FOR OPERATION (LCO) unless otherwise stated in an individual surveillance requirement. Failure to meet a surveillance requirement, whether such failure is experienced during the performance of the surveillance or between performances of the surveillances, shall be failure to meet the OPERABILITY requirements for the LCO. Failure to perform a surveillance within the allowed surveillance interval, defined by TS 4.0.b, shall be a failure to meet the OPERABILITY requirements for the LCO except as provided in TS 4.0.c. Surveillance requirements do not have to be performed on inoperable equipment." ITS SR 3.0.1 states, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variable outside specified limits."

These changes are designated as administrative because they do not result in any technical changes to the Technical Specifications.

- A09 CTS 4.0.b states "Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "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." This results in several changes to the CTS.
- ITS SR 3.0.2 adds to the CTS "For Frequencies specified as "once," the above interval extension does not apply." This is described in DOC M02.

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- ITS SR 3.0.2 adds to the CTS "If a Completion Time requires periodic performance on a "once per ..." basis, the above Frequency extension applies to each performance after the initial performance." This is described in DOC L03.
- CTS 4.0.b states, "Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states, in part, "The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency." This change is made to be consistent with the ITS terminology and to clarify the concept of the specified SR Frequency being met.

The change is acceptable since it does not change the intent of the requirements.

- ITS SR is more specific regarding the start of the Frequency by stating "as measured from the previous performance or as measured from the time a specified condition of the Frequency is met." This direction is consistent with the current use and application of the Technical Specifications.

This change is acceptable because the ITS presentation has the same intent as the CTS requirement.

- ITS SR 3.0.2 adds to the CTS "Exceptions to this Specification are stated in the individual Specifications."

This change is acceptable because it reflects practices used in the ITS that are not used in the CTS. Any changes to a Technical Specification, by inclusion of such an exception, will be addressed in the affected Technical Specification.

The changes except as discussed in DOC M02 and DOC L03 are designated as administrative because they reflect presentation and usage rules of the ITS without making technical changes to the Technical Specifications.

- A10 CTS 4.0.d, in part, states "The provision shall not prevent passage through or to operational MODES as required to comply with action requirements." Furthermore, it states that "Exceptions to these requirements are stated in the individual Technical Specifications." ITS SR 3.0.4, in part, states "This provision shall not prevent entry in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." ITS SR 3.0.4 also does not include the CTS 4.0.d exception statement.

This change is acceptable because the statement in ITS SR 3.0.4 is equivalent to the statement in the CTS. Both are stating that SR 3.0.4 shall not prevent a unit shutdown required by the Technical Specifications. The ITS wording recognizes that there are conditions in the Applicability that are not MODES, such as "During movement of irradiated fuel within containment." Furthermore, the ITS does not need any statements concerning exceptions to SR 3.0.4, thus it is not included.

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This change is designated as administrative as there is no change in the intent of the CTS and no additional flexibility is granted.

MORE RESTRICTIVE CHANGES

M01 Not Used.

M02 CTS 4.0.b states, "Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval." ITS SR 3.0.2 states "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." This changes the CTS by adding, "For Frequencies specified as "once," the above interval extension does not apply." The remaining changes to CTS 4.0.b are discussed in DOC A09 and DOC L03.

The purpose of the 1.25 extension allowance to Surveillance Frequencies is to allow for flexibility in scheduling tests. This change is acceptable because Frequencies specified as "once" are typically condition based Surveillances in which the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Frequency without extension in order to avoid operation in unacceptable conditions. This change is designated as more restrictive because an allowance to extend Frequencies by 25% is eliminated in some Surveillances.

M03 CTS 3.0.c requires action to be initiated within 1 hour, to reach HOT STANDBY (equivalent to ITS MODE 2) within the next 6 hours, HOT SHUTDOWN (equivalent to ITS MODE 3) within the following 6 hours, and COLD SHUTDOWN (equivalent to ITS MODE 5) within the subsequent 24 hours. ITS 3.0.3 requires action to be initiated within 1 hour, to be in MODE 3 within 7 hours, to be in MODE 4 within 13 hours, and MODE 5 within 37 hours. Additionally, CTS 3.0.c states the shutdown time limits in sequential order; i.e., each time limit is measured from the completion of the previous step. ITS LCO 3.0.3 states the time limits (Completion Times) from the time the condition is entered. This changes the CTS reducing the time to be in MODE 3 from 13 hours to 7 hours and adding a requirement to be MODE 4 within 13 hours.

The purpose of CTS 3.0.c is to delineate the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation. This change is acceptable since it provides the appropriate actions to take under certain conditions. These conditions are for when an associated Required Action and Completion Time is not met and no other Condition applies or the condition of the unit is not specifically addressed by the associated ACTIONS. This Specification also delineates the time limits for placing the unit in a safe MODE or other specified condition when operation

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cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner. The time limits of LCO 3.0.3 allow 7 hours to be in MODE 3 (compared to 13 hours in the CTS), 13 hours to be in MODE 4 (no action in the CTS), and 37 hours for the unit to be in MODE 5 (no change from the CTS). Also, similar to the CTS requirements, in MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications and the requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. Additionally, the CTS requirement to be in MODE 2 is not maintained since the ITS requires the unit to be in MODE 3 (a lower MODE) in the same time (i.e., 7 hours). This change is designated as more restrictive because less time is allowed to reach MODE 3 than was allowed in the CTS and a new time to reach MODE 4 (13 hours) has been added.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

- L01 ITS LCO 3.0.4 is added to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to the Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." ITS SR 3.0.4 states, "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This changes the CTS by providing

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explicit guidance for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. Kewaunee Power Station has reviewed the safety evaluation dated March 28, 2003, which was published in the Federal Register to support this change through the Consolidated Line Item Improvement Process. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-359, Rev. 8. Kewaunee Power Station has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Kewaunee Power Station and justify the incorporation of this change into the Kewaunee Power Station Technical Specifications. Therefore, the change is considered acceptable.

In addition, the proposed Bases for LCO 3.0.4 and SR 3.0.4 is consistent with that provided in the TSTF, except for minor editorial changes that do not change the intent of the TSTF Bases. The proposed Bases provides details on how to implement the new requirement. Specifically, LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c. LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessment will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plant." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and

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conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability. LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. These systems are the Low Temperature Overpressure Protection (LTOP) System, ECCS – Shutdown, Auxiliary Feedwater System, and emergency diesel generators (ITS 3.4.12, ITS 3.5.3, ITS 3.7.5, and ITS 3.8.1, respectively). LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may be applied to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that

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have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

- L02 ITS LCO 3.0.5 has been added to establish allowances for restoring equipment to service. ITS LCO 3.0.5 states "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system return to service under administrative control to perform the testing required to demonstrate OPERABILITY." This changes the CTS by adding the explicit allowance stated in LCO 3.0.5.

The purpose of LCO 3.0.5 is to establish an allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The change is acceptable since its sole purpose is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate: a. The OPERABILITY of the equipment being returned to service; or b. The OPERABILITY of other equipment. The administrative controls ensure the time that equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance. Many Technical Specification ACTIONS require an inoperable component to be removed from service, such as maintaining an isolation valve closed, disarming a control rod, or tripping an inoperable instrument channel. To allow the performance of Surveillance Requirements to demonstrate the OPERABILITY of the equipment being returned to service, or to demonstrate the OPERABILITY of other equipment or variable within limits, which otherwise could not be performed without returning the equipment to service, an exception to these Required Actions is necessary. ITS LCO 3.0.5 documents a formal allowance for accepted industry practices utilized in the restoration of inoperable equipment under CTS. Without this allowance, certain components could not be restored to OPERABLE status and plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing. This change is designated as less restrictive because LCO 3.0.5 will allow the restoration of equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS.

- L03 CTS 4.0.b states, in part, "specific surveillance intervals with a maximum allowable extension not to exceed 25% of the specified interval." ITS SR 3.0.2 includes a similar requirement, but adds the following: "If a Completion Time requires periodic performance on a "once per... " basis, the above Frequency extension applies to each performance after the initial performance." This

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changes the CTS by adding an allowance that if a Required Action's Completion Time requires periodic performance on a "once per..." basis, the 25% Frequency extension applies to each performance after the initial performance.

This change is acceptable because the 25% Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions that must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Required Actions.

- L04 CTS 3.14.b provides the action for inoperable snubbers, and requires one of the following (1, 2, or 3) within 72 hours when one or more snubbers are inoperable: 1) replace or restore the inoperable snubber; 2) isolate the fluid line restrained by the inoperable snubber from other safety related systems; or 3) initiate action to shut down the unit to HOT SHUTDOWN within 36 hours. In the ITS, the actions for inoperable snubbers are incorporated into ITS LCO 3.0.8. When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and either: a) the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 24 hours. At the end of the specified period (i.e., 24 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected support system LCO(s) shall be declared not met and the associated ACTIONS taken (which may include a unit shutdown). This changes the CTS by: a) requiring the risk associated with inoperable snubbers to be assessed and managed; b) allowing the associated safety related system to be declared inoperable yet remain unisolated, in lieu of requiring it to be isolated to use this option; c) deleting the option to shutdown the unit; and d) decreasing the amount of time allowed to perform one of the options if snubbers in both trains of a safety related system are affected.

The purpose of CTS 3.14.b is to provide a short time (72 hours) to either restore or replace inoperable snubbers prior to requiring the affected safety related system to be isolated from the inoperable and the affected safety related system to be declared inoperable. If the safety related system cannot be isolated from the snubber, then the CTS requires the unit to be shutdown. ITS LCO 3.0.8 requires the risk associated with nonfunctional required snubbers to be assessed and managed in all instances of snubber nonfunctionality. ITS LCO 3.0.8 also requires all "required" nonfunctional snubbers to be restored to functional status within the specified Completion Times. ITS LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable, provided only a single subsystem is affected. Furthermore, the ITS does not require the supported system to be isolated from the snubber. This 72 hour time is consistent with the CTS. However, ITS LCO 3.0.8.b applies when one or more

**DISCUSSION OF CHANGES**  
**ITS 3.0, LCO AND SR APPLICABILITY**

snubbers are not capable of providing their associated support function(s) to more than one subsystem of a multiple subsystem supported system, and allows 24 hours to restore the snubber(s) before declaring the supported system inoperable. Again, the ITS does not require the supported system to be isolated from the snubber. This 24 hour time is more restrictive than the CTS. The 24 hour Completion Time is acceptable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function. Furthermore, ITS LCO 3.0.8 requires that risk be assessed and managed. This risk assessment is not required in the CTS. The Bases for ITS LCO 3.0.8 provides guidance on how the risk must be assessed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of ITS LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Furthermore, Kewaunee Power Station has reviewed the additional provisions discussed in the CLIP's Model Safety Evaluation (in Federal Register Notice 69 FR 68412, November 24, 2004), Section 3.2, and will ensure appropriate plant procedures and administrative controls will be used to implement the applicable Tier 2 Restrictions. Specifically: a) at least one AFW train including a minimum set of supporting equipment required for its successful operation) not associated with the nonfunctional snubber(s) must be available when LCO 3.0.8.a is used; b) at least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the nonfunctional snubber(s), or some alternative means of core cooling must be available when LCO 3.0.8.b is used; and c) every time the provisions of LCO 3.0.8 are used, Kewaunee Power Station will confirm that at least one train of systems supported by the nonfunctional snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. In addition, a record of the design function of the nonfunctional snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restriction, and the associated plant configuration shall be available on a recoverable basis for NRC staff inspection. These Tier 2 Restrictions are also more restrictive than what is currently required by the Kewaunee Power Station CTS.

The deletion of the requirement to isolate the affected system is acceptable since it will allow the system to remain in service during the time the affected train is declared inoperable and the ACTION for the inoperable train is being taken. Thus, if an accident occurs in which the train is needed, it will function as assumed. This portion of the change could be considered as less restrictive, since the system is now not required to be isolated in order to use the CTS option to declare the train inoperable, in lieu of using the CTS shutdown option. Therefore, the change is designated overall as less restrictive. The remaining portions of this overall change are more restrictive because nonfunctional snubbers must be restored to functional status under certain conditions within a

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more restrictive Completion Time (24 hours versus 72 hours) and the risk associated with nonfunctional snubbers must always be assessed and managed.

**Improved Standard Technical Specifications (ISTS) Markup  
and Justification for Deviations (JFDs)**

[CTS](#)**3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY**

**3.0.a** LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, and LCO 3.0.8.

**3.0.a,**  
**3.0.b** LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

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

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

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Exceptions to this Specification are stated in the individual Specifications.

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

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

**DOC**  
**L01** LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications; or

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CTS

## 3.0 LCO Applicability

DOC  
L01

## LCO 3.0.4 (continued)

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

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

entry into

3

DOC  
L02

## LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

DOC  
A07

## LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

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

DOC  
A08

## LCO 3.0.7

Test Exception LCOs [3.1.8 and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Test Exception LCOs is optional. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

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[CTS](#)

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### 3.0 LCO Applicability

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- 3.14.b LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:
- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
  - b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

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

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[CTS](#)

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**3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY**

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- 4.0.a** SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
- 
- 4.0.b** 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.
- 
- 4.0.c** SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.
- If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
- When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.
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- 4.0.d** 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.

[CTS](#)

3.0 SR Applicability

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4.0.d SR 3.0.4 (continued)

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

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**JUSTIFICATION FOR DEVIATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

1. The ISTS contains bracketed information and/or values that are generic to all Westinghouse vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the generic specific information/value is revised to reflect the current plant design.
2. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01, Section 5.1.3.
3. The words "changes in" in LCO 3.0.4 has been changed to "entry into" to be consistent with the terminology used in SR 3.0.4.
4. The ISTS numbering scheme for the Safety Function Determination Program is 5.5.15. The bracketed ISTS 5.5.3, "Post Accident Sampling," and the ISTS 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," are not included in the Kewaunee Power Station (KPS) ITS. Subsequent programs in ITS Section 5.5 have been renumbered as necessary.
5. ISTS LCO 3.0.8.b states that with one of more required snubbers unable to perform their associated functions, any associated LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed and the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours. ITS LCO 3.0.8.b allows 24 hours instead of the 12 hours specified in the ISTS to return an inoperable support associated with multiple trains. This change is acceptable because the current KPS snubber requirement (CTS 3.14.b) allows 72 hours to restore an inoperable snubber on a multiple train. Therefore, reducing from 72 hours to 24 hours for an inoperable snubber on multiple trains is acceptable since the 24 hour time limit is more restrictive than the current KPS snubber requirement. Additionally the 24 hours is acceptable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system support function.

**Improved Standard Technical Specifications (ISTS) Bases  
Markup  
and Justification for Deviations (JFDs)**

## B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

## BASES

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	<p>LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:</p> <ol style="list-style-type: none"> <li>Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification, and</li> <li>Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.</li> </ol> <p>There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.</p> <p>Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.</p>

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## BASES

## LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

## LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies, or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such cases, the ACTIONS specifically state a Condition corresponding to such combinations and also that LCO 3.0.3 be entered immediately.

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## BASES

## LCO 3.0.3 (continued)

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

Upon entering LCO 3.0.3, 1 hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This includes time to permit the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower MODES of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the capabilities of the unit, assuming that only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant upset that could challenge safety systems under conditions to which this Specification applies. The use and interpretation of specified times to complete the actions of LCO 3.0.3 are consistent with the discussion of Section 1.3, Completion Times.

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

- a. The LCO is now met;
- b. A Condition exists for which the Required Actions have now been performed; or
- c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of LCO 3.0.3 allow 37 hours for the unit to be in MODE 5 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, however, the total allowable time to reach MODE 5, or other applicable MODE, is not reduced. For example, if MODE 3 is reached in 2 hours, then the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching

## BASES

## LCO 3.0.3 (continued)

MODE 4 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, 3, and 4, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 5 and 6 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, 3, or 4) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate

remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.15, "Fuel Storage Pool Water Level." LCO 3.7.15 has an Applicability of "During movement of irradiated fuel assemblies in the fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.15 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.15 of "Suspend movement of irradiated fuel assemblies in the fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

## LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions.

## BASES

## LCO 3.0.4 (continued)

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires 4 that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single 4 or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

## BASES

## LCO 3.0.4 (continued)

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Containment Air Temperature, Containment Pressure, MCPR, Moderator Temperature Coefficient), and may be applied to other Specifications based on NRC plant specific approval.

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.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

## BASES

## LCO 3.0.4 (continued)

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

## LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate:

- a. The OPERABILITY of the equipment being returned to service or
- b. The OPERABILITY of other equipment.

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The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the required testing.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of required testing on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of required testing on another channel in the same trip system.

## BASES

## LCO 3.0.6

LCO 3.0.6 establishes an exception to LCO 3.0.2 for supported systems that have a support system LCO specified in the Technical Specifications (TS). This exception is provided because LCO 3.0.2 would require that the Conditions and Required Actions of the associated inoperable supported system LCO be entered solely due to the inoperability of the support system. This exception is justified because the actions that are required to ensure the unit is maintained in a safe condition are specified in the support system LCO's Required Actions. These Required Actions may include entering the supported system's Conditions and Required Actions or may specify other Required Actions.

When a support system is inoperable and there is an LCO specified for it in the TS, the supported system(s) are required to be declared inoperable if determined to be inoperable as a result of the support system inoperability. However, it is not necessary to enter into the supported systems' Conditions and Required Actions unless directed to do so by the support system's Required Actions. The potential confusion and inconsistency of requirements related to the entry into multiple support and supported systems' LCOs' Conditions and Required Actions are eliminated by providing all the actions that are necessary to ensure the unit is maintained in a safe condition in the support system's Required Actions.

However, there are instances where a support system's Required Action may either direct a supported system to be declared inoperable or direct entry into Conditions and Required Actions for the supported system. This may occur immediately or after some specified delay to perform some other Required Action. Regardless of whether it is immediate or after some delay, when a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

Specification 5.5.15<sup>3</sup> "Safety Function Determination Program (SFDP)," ensures loss of safety function is detected and appropriate actions are taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other limitations, remedial actions, or compensatory actions may be identified as a result of the support system inoperability and corresponding exception to entering supported system Conditions and Required Actions. The SFDP implements the requirements of LCO 3.0.6.

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BASES

LCO 3.0.6 (continued)

One aspect of the SFPD is the provision for cross train checks. The SFPD requires the performance of

✓ Cross train checks to identify a loss of safety function for those support systems that support multiple and redundant safety systems are required. The cross train check verifies that the supported systems of the redundant OPERABLE support system are OPERABLE, thereby ensuring safety function is retained. [X] A loss of safety function may exist when a support system is inoperable, and:

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- a. A required system redundant to system(s) supported by the inoperable support system is also inoperable (EXAMPLE B 3.0.6-1) [X]
- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable (EXAMPLE B 3.0.6-2) [X] or [X]
- c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable (EXAMPLE B 3.0.6-3).

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EXAMPLE B 3.0.6-1 (Refer to Figure B3.0-1)

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If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5, 10, and 11.

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EXAMPLE B 3.0.6-2 (Refer to Figure B3.0-1)

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If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5.

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EXAMPLE B 3.0.6-3 (Refer to Figure B3.0-1)

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If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a loss of safety function exists in Systems 2, 4, 5, 8, 9, 10, and 11. [X]

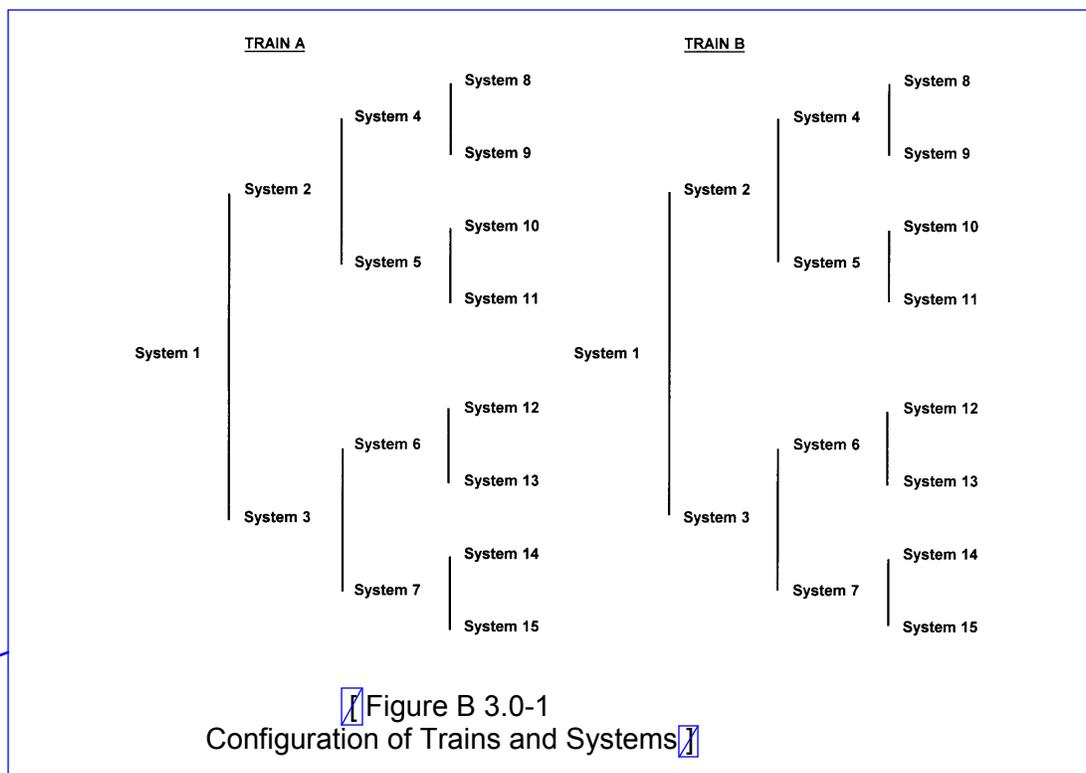
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If this evaluation determines that a loss of safety function exists, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

BASES

LCO 3.0.6 (continued)



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move to end of Section

This loss of safety function does not require the assumption of additional single failures or loss of offsite power. Since operations are being restricted in accordance with the ACTIONS of the support system, any resulting temporary loss of redundancy or single failure protection is taken into account. Similarly, the ACTIONS for inoperable offsite circuit(s) and inoperable diesel generator(s) provide the necessary restriction for cross train inoperabilities. This explicit cross train verification for inoperable AC electrical power sources also acknowledges that supported system(s) are not declared inoperable solely as a result of inoperability of a normal or emergency electrical power source (refer to the definition of OPERABILITY).

When loss of safety function is determined to exist, and the SFDP requires entry into the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists, consideration must be given to the specific type of function affected. Where a loss of function is solely due to a single Technical Specification support system (e.g., loss of automatic start due to inoperable instrumentation, or loss of pump suction

## BASES

## LCO 3.0.6 (continued)

source due to low tank level) the appropriate LCO is the LCO for the support system. The ACTIONS for a support system LCO adequately address the inoperabilities of that system without reliance on entering its supported system LCO. When the loss of function is the result of multiple support systems, the appropriate LCO is the LCO for the supported system.

## LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Test Exception LCOs [3.1.8 and 3.4.19] allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

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

## LCO 3.0.8

LCO 3.0.8 establishes conditions under which systems are considered to remain capable of performing their intended safety function when associated snubbers are not capable of providing their associated support function(s). This LCO states that the supported system is not considered to be inoperable solely due to one or more snubbers not capable of performing their associated support function(s). This is appropriate because a limited length of time is allowed for maintenance, testing, or repair of one or more snubbers not capable of performing their associated support function(s) and appropriate compensatory measures are specified in the snubber requirements, which are located outside of the Technical Specifications (TS) under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

## BASES

## LCO 3.0.8 (continued)

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

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

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

24 LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function. 15

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

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3.0-10 ) 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"> <li>The systems or components are known to be inoperable, although still meeting the SRs; or</li> <li>The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.</li> </ol> <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 to be met and performed in accordance with SR 3.0.2, prior to returning equipment to OPERABLE status.</p>

LCO

LCO

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## BASES

## SR 3.0.1 (continued)

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

An Some examples of this process are: is

a. Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. 500  
However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

b. High pressure safety injection (HPI) maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with HPI considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post maintenance testing.

## SR 3.0.2

SR 3.0.2 establishes the requirements for meeting the specified Frequency for Surveillances and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

SR 3.0.2 permits a 25% extension of the interval specified in the Frequency. This extension facilitates Surveillance scheduling and considers plant operating conditions that may not be suitable for conducting the Surveillance (e.g., transient conditions or other ongoing Surveillance or maintenance activities).

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

## 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. 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.

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, 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

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## 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 (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, etc.) is discovered to not have been performed when specified, SR 3.0.3 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.

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 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 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.

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.

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.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this

## BASES

## SR 3.0.4 (continued)

instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

The provisions of SR 3.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent **entry into** changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

"

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**JUSTIFICATION FOR DEVIATIONS  
ITS 3.0 BASES, LCO AND SR APPLICABILITY**

1. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, TSTF-GG-05-01, Section 5.1.3.
2. The ISTS contains bracketed information and/or values that are generic to all Westinghouse vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the ISTS generic information/value is revised to reflect the current plant design.
3. The ISTS Figure B 3.0-1 is located within the text portion of LCO 3.0.6. The typical configuration for locations of figures is at the end of the applicable section. The figure is relocated to the end of the LCO section for 3.0. This is acceptable since the relocation of the figure to the end of the section is in accordance with the format of the ITS.
4. Typographical/grammatical error corrected.
5. These changes are made to be consistent with changes made to LCO 3.0.4.
6. Changes made for enhanced clarity.
7. The following fixes to incorrect statements for the examples in the LCO 3.0.6 Bases have been made. Specifically:

1) Example B 3.0.6-1 is changed from "If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in supported System 5" to "If System 2 of Train A is inoperable and System 5 of Train B is inoperable, a loss of safety function exists in Systems 5, 10, and 11." Examining Figure B 3.0-1, it is clear that if there is a loss of safety function in System 5, there is also a loss of safety function in the systems supported by System 5, i.e., Systems 10 and 11. This relationship is explicitly listed in Example B 3.0.6-3 and to not do so here is inconsistent and confusing as it leads the reader to believe that Systems 10 and 11 do not have a loss of safety function. Furthermore, System 5 of Train B is not a supported System of System 2 of Train A, since they are in different trains. Thus, the word "supported" has been deleted.

2) Example B 3.0.6-2 is changed from "If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11 which is in turn supported by System 5" to "If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11." The phrase "which in turn is supported by System 5" is confusing. System 5 is not inoperable and does not lead to the loss of safety function. Examples B 3.0.6-1 and B 3.0.6-3 do not discuss OPERABLE support systems. This phrase adds no value and leads the reader to believe there is some special relationship with System 5 which does not exist.

Kewaunee Power Station needs to make these changes since the current wording in the ISTS 3.0.6 Bases are not correct.

**JUSTIFICATION FOR DEVIATIONS  
ITS 3.0 BASES, LCO AND SR APPLICABILITY**

8. This statement has been deleted since the Kewaunee Power Station ITS submittal does not state the snubbers do not meet the 10CFR50.36(c)(2)(ii) criteria. This is also consistent with the NRC SERs for DC Cook Units 1 and 2 and Monticello ITS amendments.
9. Not used.
10. These changes are made to be consistent with the wording of LCO 3.0.7.
11. The ITS SR 3.0.1 Bases allows credit to be taken for unplanned events that satisfy Surveillances. The Bases further states that this allowance also includes those SRs whose performance is normally precluded in a given MODE or other specified condition. This portion of the allowance has been deleted. As documented in Part 9900 of the NRC Inspection Manual, Technical Guidance - Licensee Technical Specifications Interpretations, and in the Bases Control Program (ITS 5.5.12), neither the Technical Specifications Bases nor Licensee generated interpretations can be used to change the Technical Specification requirements. Thus, if the Technical Specifications preclude performance of an SR in certain MODES (as is the case for some SRs in ITS Section 3.8), the Bases cannot change the Technical Specifications requirement and allow the SR to be credited for being performed in the restricted MODES, even if the performance is unplanned.
12. Changes have been made for consistency with similar discussions/terminology in the Bases.
13. The ISTS SR 3.0.1 Bases provides two examples of when it is not possible to perform post maintenance testing in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. The second example is not valid for Kewaunee Power Station and therefore it has been deleted.
14. The proper LCO title and Applicability have been provided.
15. Changes are made to be consistent with changes made to the Specification.

**Specific No Significant Hazards Considerations (NSHCs)**

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L01

Kewaunee Power Station (KPS) is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 3, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

ITS LCO 3.0.4 is added to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. ITS LCO 3.0.4 states "When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time; b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to the Specification are stated in the individual Specifications; or c. When an allowance is stated in the individual value, parameter, or other Specification. This Specification shall not prevent entry into in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit." ITS SR 3.0.4 states, "Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4. This changes the CTS by providing explicit guidance for entry into a MODE or other specified condition in the Applicability when an LCO is not met.

The purpose of LCO 3.0.4 is to provide guidance when an LCO is not met and entry into a MODE or other specified condition in the Applicability is desired. Kewaunee Power Station has reviewed the safety evaluation dated March 28, 2003, which was published in the Federal Register to support this change through the Consolidated Line Item Improvement Process. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-359, Rev. 8. Kewaunee Power Station has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Kewaunee Power Station and justify the incorporation of this change into the Kewaunee Power Station Technical Specifications. Therefore, the change is considered acceptable.

In addition, the proposed Bases for LCO 3.0.4 and SR 3.0.4 is consistent with that provided in the TSTF, except for minor editorial changes that do not change the intent of the TSTF Bases. The proposed Bases provides details on how to implement the new requirement. Specifically, LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or

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LCO 3.0.4.c. LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate. The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessment will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plant." Regulatory Guide 1.182 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of ACTIONS Completion Times that would require exiting the Applicability. LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components. The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented. The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the Completion Time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these systems and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable. These systems are the [Low Temperature Overpressure Protection (LTOP) System, ECCS – Shutdown, Auxiliary Feedwater System, and emergency diesel generators (ITS 3.4.12, ITS 3.5.3, ITS 3.7.5, and ITS 3.8.1,) respectively). LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO

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ITS 3.0, LCO AND SR APPLICABILITY**

not met based on a Note in the Specification which states LCO 3.0.4.c is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may be applied to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications that describe values and parameters. The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, and MODE 3 to MODE 4. Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Conditions and Required Actions until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specifications. Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 3.0.1 or SR 3.0.4 for Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO. This change is designated as less restrictive because entry into MODES or other specified conditions in the Applicability of a Specification might be made with an LCO not met as long as the plant is in compliance with LCO 3.0.4.

Kewaunee Power Station has evaluated whether or not a significant hazards consideration is involved with these proposed Technical Specification changes 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 provides explicit guidance for entry into a MODE or other specified condition in the Applicability when an LCO is not met. If the inoperability of a component or variable could increase the probability of an accident previously evaluated, the corresponding ACTIONS would not allow operation in that condition for an unlimited period of time; the risk assessment will not allow entry into the condition, and an allowance will not be provided in accordance with LCO 3.0.4. As a result, the probability of an accident previously evaluated is not significantly affected by this change. ACTIONS which allow operation for an unlimited period of time with an inoperable component or variable provide compensatory measures that protect the affected safety function, including any mitigation actions assumed in accidents previously evaluated. For example, inoperable isolation valves are closed or inoperable instrument channels are placed in trip. Since the affected safety functions continue to be protected, the mitigation functions of the component or variable

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continue to be performed. The risk assessment, for the purposes of LCO 3.0.4.b, must take into account all inoperable Technical Specification equipment. Therefore, entry will not be allowed if there is a loss of safety functions. This allowance permits entry into the applicable MODE(S) while relying on the ACTIONS. As a result, the consequences of any accident previously evaluated are not increased significantly. Therefore, the proposed 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 allows entering a MODE or other specified condition in the Applicability when the allowances of LCO 3.0.4 are met. This change will not physically alter the plant (no new or different type of equipment will be installed). The change also does not require any new or revised operator actions in that operation of the unit while complying with ACTIONS is common. 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 a margin of safety?**

Response: No.

The proposed change allows entering a MODE or other specified condition in the Applicability when the allowances of LCO 3.0.4 are met. This change will allow unit operation in MODES or other specified conditions in the Applicability while relying on ACTIONS that would have been previously prohibited. However, LCO 3.0.4 will only allow entry as long as the safety function is maintained. As a result, the margin of safety is not significantly affected. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Kewaunee Power Station concludes that the proposed change 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.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY****10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L02**

Kewaunee Power Station (KPS) is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 3, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

ITS LCO 3.0.5 has been added to establish allowances for restoring equipment to service. ITS LCO 3.0.5 states "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system return to service under administrative control to perform the testing required to demonstrate OPERABILITY." This changes the CTS by adding the explicit allowance stated in LCO 3.0.5.

The purpose of LCO 3.0.5 is to establish an allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The change is acceptable since its sole purpose is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of required testing to demonstrate: a. The OPERABILITY of the equipment being returned to service; or b. The OPERABILITY of other equipment. The administrative controls ensure the time that equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the required testing to demonstrate OPERABILITY. This Specification does not provide time to perform any other preventive or corrective maintenance. Many Technical Specification ACTIONS require an inoperable component to be removed from service, such as maintaining an isolation valve closed, disarming a control rod, or tripping an inoperable instrument channel. To allow the performance of Surveillance Requirements to demonstrate the OPERABILITY of the equipment being returned to service, or to demonstrate the OPERABILITY of other equipment or variable within limits, which otherwise could not be performed without returning the equipment to service, an exception to these Required Actions is necessary. ITS LCO 3.0.5 is necessary to establish an allowance that, although informally utilized in restoration of inoperable equipment, is not formally recognized in the CTS. Without this allowance, certain components could not be restored to OPERABLE status and plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing. This change is designated as less restrictive because LCO 3.0.5 will allow the restoration of equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

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 adds an allowance for restoring equipment to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. ITS LCO 3.0.5 is necessary to establish an allowance that, although informally utilized in restoration of inoperable equipment, is not formally recognized in the CTS. Without this allowance, certain components could not be restored to OPERABLE status and a plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing. Therefore, the proposed 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 adds an allowance for restoring equipment to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This change will not physically alter the plant (no new or different type of equipment will be installed). Also, the change does not involve any new or revised operator actions. 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 a margin of safety?**

Response: No.

The proposed change adds an allowance for restoring equipment to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. The margin of safety is not affected by this change because without this allowance, certain components could not be restored to OPERABLE status and a plant shutdown would ensue. ITS LCO 3.0.5 is necessary to establish an allowance that, although informally utilized in restoration of inoperable equipment, is not formally recognized in the CTS. Without this allowance, certain components could not be restored to OPERABLE status and a plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing. Thus, the margin of safety impact is no different than that currently exists when equipment is restored to service. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Kewaunee Power Station concludes that the proposed change 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.

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L03

Kewaunee Power Station (KPS) is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 3, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

CTS 4.0.b states, in part, "specific surveillance intervals with a maximum allowable extension not to exceed 25% of the specified interval." ITS SR 3.0.2 includes a similar requirement, but adds the following: "If a Completion Time requires periodic performance on a "once per... " basis, the above Frequency extension applies to each performance after the initial performance." This changes the CTS by adding an allowance that if a Required Action's Completion Time requires periodic performance on a "once per..." basis, the 25% Frequency extension applies to each performance after the initial performance.

This change is acceptable because the 25% Frequency extension given to provide scheduling flexibility for Surveillances is equally applicable to Required Actions that must be performed periodically. The initial performance is excluded because the first performance demonstrates the acceptability of the current condition. Such demonstrations should be accomplished within the specified Completion Time without extension in order to avoid operation in unacceptable conditions. This change is designated as less restrictive because additional time is provided to perform some periodic Required Actions.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes 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 allows the Completion Time for periodic actions to be extended by 25 percent. This change does not significantly affect the probability of an accident. The length of time between performance of Required Actions is not an initiator to any accident previously evaluated. The consequences of any accident previously evaluated are the same during the Completion Time or during any extension of the Completion Time. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the proposed 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?**

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY**

Response: No.

The proposed change allows the Completion Time for periodic actions to be extended by 25 percent. This change will not physically alter the plant (no new or different type of equipment will be installed). Also, the change does not involve any new or revised operator actions. 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 a margin of safety?**

Response: No.

The proposed change allows the Completion Time for periodic actions to be extended by 25 percent. The 25 percent extension allowance is provided for scheduling convenience and is not expected to have a significant effect on the average time between Required Actions. As a result, the Required Actions will continue to provide appropriate compensatory measures for the subject Condition. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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

**DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS  
ITS 3.0, LCO AND SR APPLICABILITY****10 CFR 50.92 EVALUATION  
FOR  
LESS RESTRICTIVE CHANGE L04**

Kewaunee Power Station (KPS) is converting to the Improved Technical Specifications (ITS) as outlined in NUREG-1431, Rev. 3, "Standard Technical Specifications, Westinghouse Plants." The proposed change involves making the Current Technical Specifications (CTS) less restrictive. Below is the description of this less restrictive change and the determination of No Significant Hazards Considerations for conversion to NUREG-1431.

CTS 3.14.b provides the action for inoperable snubbers, and requires one of the following (1, 2, or 3) within 72 hours when one or more snubbers are inoperable: 1) replace or restore the inoperable snubber; 2) isolate the fluid line restrained by the inoperable snubber from other safety related systems; or 3) initiate action to shut down the unit to HOT SHUTDOWN within 36 hours. In the ITS, the actions for inoperable snubbers are incorporated into ITS LCO 3.0.8. When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and either: a) the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated function within 72 hours; or b) the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 24 hours. At the end of the specified period (i.e., 24 hours or 72 hours) snubbers must be able to perform their associated function(s), or the affected support system LCO(s) shall be declared not met and the associated ACTIONS taken (which may include a unit shutdown). This changes the CTS by: a) requiring the risk associated with inoperable snubbers to be assessed and managed; b) allowing the associated safety related system to be declared inoperable yet remain unisolated, in lieu of requiring it to be isolated to use this option; c) deleting the option to shutdown the unit; and d) decreasing the amount of time allowed to perform one of the options if snubbers in both trains of a safety related system are affected.

The purpose of CTS 3.14.b is to provide a short time (72 hours) to either restore or replace inoperable snubbers prior to requiring the affected safety related system to be isolated from the inoperable and the affected safety related system to be declared inoperable. If the safety related system cannot be isolated from the snubber, then the CTS requires the unit to be shutdown. ITS LCO 3.0.8 requires the risk associated with nonfunctional required snubbers to be assessed and managed in all instances of snubber nonfunctionality. ITS LCO 3.0.8 also requires all "required" nonfunctional snubbers to be restored to functional status within the specified Completion Times. ITS LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable, provided only a single subsystem is affected. Furthermore, the ITS does not require the supported system to be isolated from the snubber. This 72 hour time is consistent with the CTS. However, ITS LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one subsystem of a multiple subsystem supported system, and allows 24 hours to restore the snubber(s) before declaring the supported system inoperable. Again, the ITS does not require the supported system to be isolated from the snubber. This 24 hour

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time is more restrictive than the CTS. The 24 hour Completion Time is acceptable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function. Furthermore, ITS LCO 3.0.8 requires that risk be assessed and managed. This risk assessment is not required in the CTS. The Bases for ITS LCO 3.0.8 provides guidance on how the risk must be assessed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of ITS LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Furthermore, Kewaunee Power Station has reviewed the additional provisions discussed in the CLIP's Model Safety Evaluation (in Federal Register Notice 69 FR 68412, November 24, 2004), Section 3.2, and will ensure appropriate plant procedures and administrative controls will be used to implement the applicable Tier 2 Restrictions. Specifically: a) at least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the nonfunctional snubber(s) must be available when LCO 3.0.8.a is used; b) at least one AFW train (including a minimum set of supporting equipment required for its successful operation) not associated with the nonfunctional snubber(s), or some alternative means of core cooling must be available when LCO 3.0.8.b is used; and c) every time the provisions of LCO 3.0.8 are used, Kewaunee Power Station will confirm that at least one train of systems supported by the nonfunctional snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. In addition, a record of the design function of the nonfunctional snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restriction, and the associated plant configuration shall be available on a recoverable basis for NRC staff inspection. These Tier 2 Restrictions are also more restrictive than what is currently required by the Kewaunee Power Station CTS.

The deletion of the requirement to isolate the affected system is acceptable since it will allow the system to remain in service during the time the affected train is declared inoperable and the ACTION for the inoperable train is being taken. Thus, if an accident occurs in which the train is needed, it will function as assumed. This portion of the change could be considered as less restrictive, since the system is now not required to be isolated in order to use the CTS option to declare the train inoperable, in lieu of using the CTS shutdown option. Therefore, the change is designated overall as less restrictive. The remaining portions of this overall change are more restrictive because nonfunctional snubbers must be restored to functional status under certain conditions within a more restrictive Completion Time (24 hours versus 72 hours) and the risk associated with nonfunctional snubbers must always be assessed and managed.

An evaluation has been performed to determine whether or not a significant hazards consideration is involved with these proposed Technical Specification changes by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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- 1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?**

Response: No.

The proposed change allows the affected train to be unisolated during the time provided to restore the affected train. Furthermore, this change decreases the amount of time allowed to restore an inoperable snubber. Not isolating the affected system or reducing the time allowed to restore a snubber is not an initiator of any accident previously evaluated. Consequently, the probability of an accident previously evaluated is not significantly increased. The consequences of any accident previously evaluated are the same during the Completion Time or during any reduction of the Completion Time. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the proposed 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 allows the affected train to be unisolated during the time provided to restore the affected train. Furthermore, this change decreases the amount of time allowed to restore an inoperable snubber. 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. While the affected system is not required to be isolated from the inoperable snubber, normal plant operations are not affected. Thus, 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 allows the affected train to be unisolated during the time provided to restore the affected train. Furthermore, this change decreases the amount of time allowed to restore an inoperable snubber. Maintaining the affected system unisolated during the system restoration time will allow the system to function as designed if an accident were to occur during this short restoration time. If the system were isolated, it would not be able to function. Furthermore, less time is now provided to restore the snubber if it affects both trains of a safety related system. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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