1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
DESCRIPTION	The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability. If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the time of discovery of the situation that required entry into the Condition. Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will <u>not</u> result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition. However, when a <u>subsequent</u> division, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability: a. Must exist concurrent with the <u>first</u> inoperability and b. Must remain inoperable or not within limits after the first inoperability is resolved.

1.3 Completion Times

DESCRIPTION (continued)

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours or

b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each division, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ."

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

1.3 Completion Times

EXAMPLES (continued)

The Required Actions of Condition B are to be in MODE 3 within 12 hours AND in MODE 4 within 36 hours. A total of 12 hours is allowed for reaching MODE 3 and a total of 36 hours (not 48 hours) is allowed for reaching MODE 4 from the time that Condition B was entered. If MODE 3 is reached within 6 hours, the time allowed for reaching MODE 4 is the next 30 hours because the total time allowed for reaching MODE 4 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 4 is the next 36 hours.

EXAMPLE 1.3-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Conditions A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

1.3 Completion Times

EXAMPLES (continued)

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. LCO 3.0.3 is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition A was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X subsystem inoperable.	A.1 Restore Function X subsystem to OPERABLE status.	7 days
B. One Function Y subsystem inoperable.	B.1 Restore Function Y subsystem to OPERABLE status.	72 hours
C. One Function X subsystem inoperable. AND One Function Y subsystem inoperable.	C.1 Restore Function X subsystem to OPERABLE status. OR C.2 Restore Function Y subsystem to OPERABLE status.	72 hours 72 hours

When one Function X subsystem and one Function Y subsystem are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each subsystem starting from the time each subsystem was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second subsystem was declared inoperable (i.e., the time the situation described in Condition C was discovered).

1.3 Completion Times

EXAMPLES (continued)

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected subsystem was declared inoperable (i.e., initial entry into Condition A).

It is possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. However, doing so would be inconsistent with the basis of the Completion Times. Therefore, there shall be administrative controls to limit the maximum time allowed for any combination of Conditions that result in a single contiguous occurrence of failing to meet the LCO. These administrative controls shall ensure that the Completion Times for those Conditions are not inappropriately extended.

EXAMPLE 1.3-4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

1.3 Completion Times

EXAMPLES (continued)

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (plus the extension) expires while one or more valves are still inoperable, Condition B is entered.

EXAMPLE 1.3-5

ACTIONS

----------NOTE----------
Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	12 hours 36 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

1.3 Completion Times

EXAMPLES (continued)

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x. OR A.2 Reduce THERMAL POWER to ≤ 50% RTP.	Once per 8 hours 8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1

1.3 Completion Times

EXAMPLES (continued)

begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

EXAMPLE 1.3-7

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour AND Once per 8 hours thereafter
	AND	
	A.2 Restore subsystem to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours
	AND	
	B.2 Be in MODE 4.	36 hours

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

1.3 Completion Times

EXAMPLES (continued)

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

---------- Reviewer's Note ----------
Example 1.3-8 is only applicable to plants that have adopted the Risk Informed Completion Time Program.

[EXAMPLE 1.3-8

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Restore subsystem to OPERABLE status.	7 days
	OR	
	A.2.1 Establish a RICT	7 days
	AND	
	A.2.2 Restore subsystem to OPERABLE status	In accordance with the Risk Informed Completion Time Program, not to exceed 30 days

-------Note-------- Condition B may not be voluntarily entered ---------- B. Two subsystems inoperable.	B.1 Establish a RICT AND B.2 Restore at least one subsystem to OPERABLE status.	1 hour In accordance with the Risk Informed Completion Time Program, not to exceed 30 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours

When a subsystem is declared inoperable, Condition A is entered. The 7 day Completion Time may be applied as discussed in Example 1.3-2. However, the licensee may elect to apply the Risk Informed Completion Time Program which permits calculation of a Risk Informed Completion Time (RICT) that may be used to complete the Required Action beyond the 7 day Completion Time. The RICT cannot exceed 30 days. After the 7 day Completion Time has expired, the subsystem must be restored to OPERABLE status within the RICT or Condition C must also be entered.

If a second subsystem is declared inoperable, Condition B is also entered. At least one subsystem must be restored to OPERABLE status within 1 hour or Condition C must also be entered. For emergent conditions, the licensee may be able to apply a RICT if the requirements of the Risk Informed Completion Time Program are met. A RICT cannot be applied if Condition B is entered voluntarily.

The Risk Informed Completion Time Program requires recalculation of the RICT to reflect changing plant conditions. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.

If the 7 day Completion Time clock of Condition A or the 1 hour Completion Time clock of Condition B have expired and subsequent changes in plant condition result in exiting the applicability of the Risk Informed Completion Time Program without restoring the inoperable subsystem to OPERABLE status, Condition C is also entered and the Completion Time clocks for Required Actions C.1 and C.2 start.

If the RICT expires or is recalculated to be less than the elapsed time since the Condition was entered and the inoperable subsystem has not been restored to

OPERABLE status, Condition C is also entered and the Completion Time clocks for Required Actions C.1 and C.2 start. If the inoperable subsystems are restored to OPERABLE status after Condition C is entered, Conditions A, B, and C are exited, and therefore, the Required Actions of Condition C may be terminated.]

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.