



May 3, 2011

ULNRC-05779

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

10 CFR 50.90

Ladies and Gentlemen:

**DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
LICENSE AMENDMENT APPLICATION SUPPLEMENT FOR A
TECHNICAL SPECIFICATION CHANGE THAT WOULD RELOCATE
SPECIFIC SURVEILLANCE FREQUENCIES TO A LICENSEE
CONTROLLED PROGRAM (LDCN 10-0020) (TAC NO. ME4506)**

- Reference: 1. AmerenUE Letter (ULNRC-05725) dated August 5, 2010
2. Ameren Missouri Letter (ULNRC-05762) dated March 23, 2011

In letter ULNRC-05725, Union Electric Company (dba AmerenUE, now Ameren Missouri) submitted an application for amendment to Facility Operating License Number NPF-30 for the Callaway Plant. The proposed amendment would modify Callaway Plant Unit 1 Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program consistent with Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specification Initiative 5B, Risk-Informed Method for Control of Surveillance Frequencies." During the NRC Staff review, a request for additional information (RAI) was transmitted to Ameren Missouri. In letter ULNRC-05762, Ameren Missouri provided a response to the NRC Staffs RAI.

Several corrections to the original license amendment request have been identified by Callaway Plant personnel. In the original license amendment request submitted via ULNRC-05725, it was proposed that the definition of 'STAGGERED TEST BASIS' be deleted from the plant Technical Specifications. However, it has been determined that Technical Specification 5.5.17, "Control Room Envelope Habitability Program", paragraph d still uses this defined term. Thus, the definition of STAGGERED TEST BASIS should not be deleted as proposed in the original license amendment request. Additionally, the original license amendment did not include replacement of the frequency

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for TS SR 3.7.19.2. Several Technical Specification Bases changes were also identified as being necessary and are also included in this supplement.

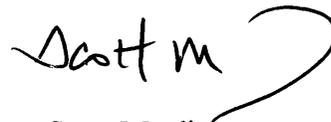
Attachment 1 contains a description and markup of the Technical Specification changes requested in addition to those requested in the original submittal. Attachment 2 contains a description and markup of the additional changes that will be necessary for the Technical Specification Bases upon approval of the amendment.

The No Significant Hazards Consideration determination provided in the original submittal is not altered by the additional information provided in this letter.

If there are any questions, please contact Scott Maglio at 573-676-8178.

Sincerely,

Executed on: 5/3/2011

A handwritten signature in black ink that reads "Scott M" followed by a large, sweeping flourish that extends to the right and loops back down.

Scott Maglio
Regulatory Affairs Manager

RCW/nls

Attachments:

1. Proposed Technical Specification changes to the submittal provided in ULNRC-05725.
2. Proposed Technical Specification Bases changes to the submittal provided in ULNRC-05725.

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Attachment 1

Proposed Technical Specification changes to the submittal provided in ULNRC-05725.

Technical Specification	Reason for the change to the submittal
1.1 Definitions: STAGGERED TEST BASIS	Technical Specification 5.5.17, Control Room Envelope Habitability Program, paragraph d. still uses this defined term. Thus, it is Callaway Plant's intention to maintain the definition of STAGGERED TEST BASIS and not delete this definition as provided in the original license amendment request.
SR 3.7.19.2	Technical specification 3.7.19 was approved under Amendment 198 on June 29, 2010 (reference ML101110103). This technical specification previously did not exist. This license amendment was in development at the time the Safety Evaluation Report for Amendment 198 was received which resulted in the changes to SR 3.7.19.2 not being included in the original submittal.

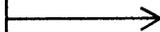
1.1 Definitions (continued)

SLAVE RELAY TEST

A SLAVE RELAY TEST shall consist of energizing all slave relays in the channel required for channel OPERABILITY and verifying the OPERABILITY of each required slave relay. The SLAVE RELAY TEST shall include a continuity check of associated required testable actuation devices. The SLAVE RELAY TEST may be performed by means of any series of sequential, overlapping, or total steps.

~~STAGGERED TEST BASIS~~

This definition to be retained to support use in TS 5.5.17 paragraph d.



~~A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function.~~

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)

A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of all devices in the channel required for trip actuating device OPERABILITY. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the necessary accuracy. The TADOT may be performed by means of any series of sequential, overlapping, or total channel steps.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and Associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.19.1	Verify the isolation time of each automatic SSIV is within limits.	In accordance with the Inservice Testing Program
SR 3.7.19.2	Verify each automatic SSIV in the flow path actuates to the isolation position on an actual or simulated actuation signal.	18 months

In accordance with the Surveillance Frequency Control Program

Attachment 2

Proposed Technical Specification Bases changes to the submittal provided in ULNRC-05725.

Technical Specification Bases	Reason for the change to the submittal
SR 3.3.2.7	Delete additional wording describing the bases for the existing SR frequency. Going forward the SR Frequency would be selected in accordance with the proposed Surveillance Frequency Control Program.
SR 3.3.2.12	Delete the specified frequency of 'monthly' from the TS Bases in addition to the reference to other Technical Specifications and non-Technical Specifications that are performed at least once per refueling interval with applicable extensions. Going forward the SR Frequency would be selected in accordance with the proposed Surveillance Frequency Control Program.
SR 3.4.12.8	Delete the description of a specified frequency of 'at least once per refueling interval with applicable extensions.' Going forward the SR Frequency would be selected in accordance with the proposed Surveillance Frequency Control Program.
SR 3.6.3.1	Delete the description of a specified frequency that is a result of an NRC initiative, Multi-Plant No. B-24, related to containment purge valve use during plant operations. Going forward the SR Frequency would be selected in accordance with the proposed Surveillance Frequency Control Program.
SR 3.6.3.6	Deleted the description that operating experience has demonstrated that the testing frequency is adequate to assure this penetration is leak tight. Going forward the SR Frequency would be selected in accordance with the proposed Surveillance Frequency Control Program.
TSB 3.7.2	Replacing outdated TSB text from revision 8 of this TSB section with proposed changes to the exiting TSB bases section (revision 9). Text changes to TSB SR 3.7.2.2. Going forward the SR Frequency

Attachment 2
to ULNRC-05779

	would be selected in accordance with the proposed Surveillance Frequency Control Program.
SR 3.7.19.2	Technical specification 3.7.19 was approved under Amendment 198 on June 29, 2010 (reference ML101110103). This technical specification previously did not exist. This license amendment was in development at the time the Safety Evaluation Report for Amendment 198 was received which resulted in the changes to TSB SR 3.7.19.2 not being included in the original submittal. The proposed bases change replaces the specified frequency of 18 months with “The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.”

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.3.2.6 (continued)

Insert 1 →

SR 3.3.2.14. The Frequency is adequate, based on industry operating experience, considering instrument reliability and operating history data.

SR 3.3.2.7

SR 3.3.2.7 is the performance of a TADOT every 18 months. This test is a check of the AFW pump start on Loss of Offsite Power trip Function. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The trip actuating devices tested within the scope of SR 3.3.2.7 are the LSELS output relays and BOP ESFAS separation groups 1 and 4 logic associated with the automatic start of the turbine driven auxiliary feedwater pump on an ESF bus undervoltage condition. The Frequency is adequate. It is based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints for relays. The trip actuating devices tested have no associated setpoint.

Insert 1 →

SR 3.3.2.8

SR 3.3.2.8 is the performance of a TADOT. This test is a check of the Manual Actuation Functions and AFW pump start on trip of all MFW pumps (PAE01A and PAE01B). The Manual Safety Injection TADOT shall independently verify OPERABILITY of the undervoltage and shunt trip handswitch contacts for both the Reactor Trip Breakers and Reactor Trip Bypass Breakers as well as the contacts for safety injection actuation. It is performed every 18 months. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable TADOT of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The Frequency is adequate, based on industry operating experience and is consistent with the typical refueling cycle. The SR is modified by a Note that excludes verification of setpoints during the TADOT for manual initiation Functions. The manual initiation Functions have no associated setpoints. The Note exclusion does not

Insert 1 →

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.3.2.11 (continued)

TADOT does not include the circuitry associated with steam dump operation since it is control grade circuitry.

SR 3.3.2.12

SR 3.3.2.12 is the performance of a monthly COT on ESFAS Function 6.h, "AFW Pump Suction Transfer on Suction Pressure - Low." A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions.

A COT is performed to ensure the channel will perform the intended Function. Setpoints must be found within the Allowable Values specified in Table 3.3.2-1.

The setpoint shall be left set consistent with the assumptions of the current unit specific setpoint methodology.

Insert 1 →

SR 3.3.2.13

SR 3.3.2.13 is the performance of a SLAVE RELAY TEST as described in SR 3.3.2.6, except that SR 3.3.2.13 has a Note specifying that it applies only to slave relays K602, K622, K624, K630, K740, and K741. These slave relays are tested with a Frequency of 18 months and prior to entering MODE 4 for Functions 1.b, 3.a.(2), and 7.a whenever the unit has been in MODE 5 or 6 for > 24 hours, if not performed within the previous 92 days (Reference 12). The 18 month Frequency for these slave relays is based on the need to perform this Surveillance under the conditions that apply during a unit outage to avoid the potential for an unplanned transient if the Surveillance were performed with the reactor at power.

specified in the Surveillance Frequency Control Program

Insert 1 →

SR 3.3.2.14

SR 3.3.2.14 is the performance of a SLAVE RELAY TEST as described in SR 3.3.2.6, except that SR 3.3.2.14 has a Note specifying that it applies only to slave relays K620 and K750. These slave relays are tested with a

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**
(continued)

SR 3.4.12.6

Any passive vent path arrangement must only be open when required to be OPERABLE. This Surveillance is required if the vent is being used to satisfy the pressure relief requirements of the LCO 3.4.12d.

The PORV block valve must be verified open ~~every 72 hours~~ to provide the flow path for each required PORV to perform its function when actuated. The valve must be remotely verified open in the main control room. This Surveillance is only required to be performed if the PORV is being used to meet this LCO.

The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required removed, and the manual operator is not required locked in the inactive position. Thus, the block valve can be closed in the event the PORV develops excessive seat leakage or does not close (sticks open) after relieving an overpressure situation.

Insert 1 →

The 72 hour Frequency is considered adequate in view of other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open.

SR 3.4.12.7

Not used.

SR 3.4.12.8

Performance of a COT is required within 12 hours after decreasing RCS temperature to $\leq 275^{\circ}\text{F}$ and ~~every 31 days~~ on each required PORV to verify and, as necessary, adjust its lift setpoint. A successful test of the required contact(s) of a channel relay may be performed by the verification of the change of state of a single contact of the relay. This clarifies what is an acceptable CHANNEL OPERATIONAL TEST of a relay. This is acceptable because all of the other required contacts of the relay are verified by other Technical Specifications and non-Technical Specifications tests at least once per refueling interval with applicable extensions. The COT will verify the setpoint is within the PTLR allowed maximum limits in the PTLR. PORV actuation could depressurize the RCS and is not required.

(continued)

BASES (Continued)

**SURVEILLANCE
REQUIREMENTS**

SR 3.6.3.1

Insert 1 →

Each 36 inch Containment Shutdown Purge valve outside containment is required to be verified sealed closed or closed with blind flange installed at 31 day intervals. Each 36 inch Containment Shutdown Purge valve inside containment must be verified sealed closed or blind flange installed prior to entering Mode 4 from Mode 5, if the surveillance has not been performed in the previous 92 days. This Surveillance is designed to ensure that a gross breach of containment is not caused by an inadvertent or spurious opening of a Containment Shutdown Purge valve. Detailed analysis of the purge valves failed to conclusively demonstrate their ability to close during a LOCA in time to limit offsite doses. Therefore, these valves are required to be in the sealed closed position or closed with blind flange installed during MODES 1, 2, 3, and 4. A Containment Shutdown Purge valve that is sealed closed must have motive power to the valve operator removed. This can be accomplished by de-energizing the source of electric power or by removing the air supply to the valve operator. In this application, the term "sealed" has no connotation of leak tightness. The Frequency is a result of an NRC initiative, Multi-Plant Action No. B-24 (Ref. 5), related to containment purge valve use during plant operations. In the event Containment Shutdown Purge valve leakage requires entry into Condition B, the Surveillance permits opening one purge valve in a penetration flow path to perform repairs. A blind flange installed to isolate a Containment Shutdown Purge valve must meet the leakage rate testing requirements of SR 3.6.3.6.

SR 3.6.3.2

This SR ensures that the mini-purge valves are closed as required or, if open, open for an allowable reason. If a mini-purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits. The SR is not required to be met when the mini-purge valves are open for the reasons stated. The valves may be opened for pressure control, ALARA or air quality considerations for personnel entry, or for Surveillances that require the valves to be open. The mini-purge valves are capable of closing in the environment following a LOCA. Therefore, these valves are allowed to be open for limited periods of time. The 31 day Frequency is consistent with

Insert 1 →

other containment isolation valve requirements discussed in SR 3.6.3.3.

(continued)

BASES

**SURVEILLANCE
REQUIREMENTS**

SR 3.6.3.4 (continued)

these valves were verified to be in the current position upon locking, sealing, or securing.

A Note has been added that allows valves and blind flanges located in high radiation areas to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since access to these areas is typically restricted during MODES 1, 2, 3, and 4, for ALARA reasons. Therefore, the probability of misalignment of these containment isolation valves, once they have been verified to be in their proper position, is small.

SR 3.6.3.5

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. An automatic power operated containment isolation valve is a containment isolation valve which is closed by an automatic (i.e., other than operator manual) actuation signal and is powered by other than manual actuation (e.g. by a pneumatic, solenoid, or motor operator). The isolation time test ensures the valve will isolate in a time period less than or equal to that assumed in the safety analyses. The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.

SR 3.6.3.6

Leakage integrity tests with a maximum allowable leakage rate for containment shutdown purge supply and exhaust isolation valves will provide early indication of resilient material seal degradation and will allow opportunity for repair before gross leakage failures could develop.

This SR is modified by a Note indicating that the SR is only required to be performed when the containment shutdown purge valve blind flanges are installed.

Insert 1

If the blind flange is installed, leakage rate testing of the valve and its associated blind flange must be performed every 24 months and following each reinstallation of the blind flange. Operating experience has demonstrated that this testing frequency is adequate to assure this penetration is leak tight.

Leakage rate testing must also be performed

(continued)

BASES

ACTIONS
(continued)

I.1 and I.2

If the MSIVs cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.2.1

This SR verifies that the closure time of each MSIV is within the limits of Figure B 3.7.2-1 from each actuator train when tested pursuant to the Inservice Test Program. The MSIV isolation time is assumed in the accident and containment analyses. Figure B 3.7.2-1 is a curve of the MSIV isolation time as a function of steam generator pressure, since there is no pressure indication available at the MSIVs. The acceptance curve for the MSIV stroke time is conservative enough to account for potential pressure differential between the steam generator pressure indication and pressure at the MSIVs. Meeting the MSIV isolation times in Figure B 3.7.2-1 ensures that the evaluation performed in Reference 8 remains valid. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be tested at power, since even a part stroke exercise increases the risk of a valve closure when the unit is generating power.

The Frequency is in accordance with the Inservice Testing Program.

SR 3.7.2.2

This SR verifies that each MSIV is capable of closure on an actual or simulated actuation signal. The manual fast close handswitch in the Control Room provides an acceptable actuation signal. Each actuation train must be tested separately. This Surveillance is normally performed upon returning the unit to operation following a refueling outage in conjunction with SR 3.7.2.1. However, it is acceptable to perform this surveillance individually. The frequency of MSIV testing is every 18 months. The 18 month Frequency for testing is based on the refueling cycle. This Frequency is acceptable from a reliability standpoint.

Insert 1 →

(continued)

The Bases for TS 3.7.2 was revised to include the MSIVBVs and MSLPDIIVS in revision 9 attached. Replacing this page with the markup of TSB 3.7.2 attached.

BASES (Continued)

**SURVEILLANCE
REQUIREMENTS**

SR 3.7.2.1

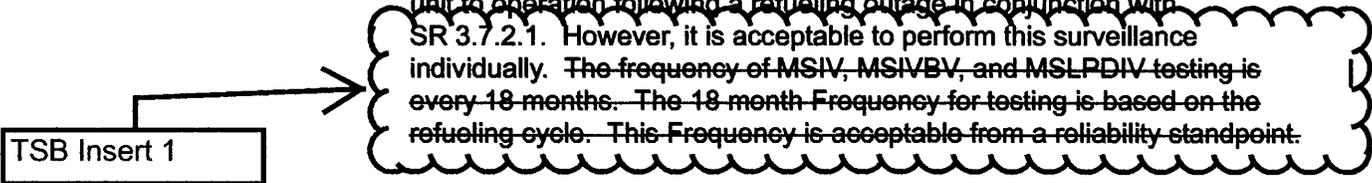
This SR verifies that the closure time of each MSIV is within the limits of Figure B 3.7.2-1 from each actuator train when tested pursuant to the Inservice Test Program. The MSIV isolation time is assumed in the accident and containment analyses. Figure B 3.7.2-1 is a curve of the MSIV isolation time as a function of steam generator pressure, since there is no pressure indication available at the MSIVs. The acceptance curve for the MSIV stroke time is conservative enough to account for potential pressure differential between the steam generator pressure indication and pressure at the MSIVs. Meeting the MSIV isolation times in Figure B 3.7.2-1 ensures that the evaluation performed in Reference 8 remains valid. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be tested at power, since even a part stroke exercise increases the risk of a valve closure when the unit is generating power.

The Frequency is in accordance with the Inservice Testing Program.

SR 3.7.2.2

This SR verifies that each MSIV, each MSIVBV, and each MSLPDIV is capable of closure on an actual or simulated actuation signal. The manual fast close handswitch in the Control Room provides an acceptable actuation signal. For the MSIVs each actuation train must be tested separately. This Surveillance is normally performed upon returning the unit to operation following a refueling outage in conjunction with SR 3.7.2.1. However, it is acceptable to perform this surveillance individually. ~~The frequency of MSIV, MSIVBV, and MSLPDIV testing is every 18 months. The 18-month Frequency for testing is based on the refueling cycle. This Frequency is acceptable from a reliability standpoint.~~

TSB Insert 1



SR 3.7.2.3

This SR verifies that the closure time of each MSIVBV and MSLPDIV is ≤ 15 seconds when tested pursuant to the Inservice Testing Program. This is consistent with the assumptions used in the accident and containment analyses.

For the MSIVBVs and MSLPDIVs, this Surveillance is performed routinely during plant operations (or as required for post-maintenance testing), but it may also be required to be performed upon returning the unit to operation following a refueling outage.

(continued)

BASES

ACTIONS
(continued)

B.1 and B.2

If the Required Action and associated Completion Time of Condition A are not met, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions in an orderly manner and without challenging unit systems.

**SURVEILLANCE
REQUIREMENTS**

SR 3.7.19.1

This SR verifies that the isolation time of each automatic SSIV is within limits when tested pursuant to the Inservice Testing Program (IST). The specific limits are documented in the Inservice Testing Program. The SSIV isolation times are less than or equal to those assumed in the accident and containment analyses. This surveillance does not include verifying a closure time for the steam generator chemical addition injection isolation valves. An exception is made for these normally locked closed valves, which are not included in the IST program, because the valves are passive (typically not required to actuate into their safety position) and they contain a locking device and a check valve in their flow path.

For the SSIVs, performance of this surveillance may be done during plant operation (or as required for post-maintenance testing), but it may also be required to be performed upon returning the unit to operation following a refueling outage.

The Frequency for this SR is in accordance with the Inservice Testing Program.

SR 3.7.19.2

This SR verifies that each automatic SSIV in the flow path is capable of closure on an actual or simulated actuation signal. This surveillance is routinely performed during plant operation, but may also be performed upon returning the unit to operation following a refueling outage.

The Frequency for this SR is 18 months.

← TSB Insert 1

(continued)

TS Bases Inserts

TSB Insert 1

The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.