TSTF-425 NOA states:

"All surveillance frequencies can be relocated except:

- Frequencies that reference other approved programs for the specific interval (such as the In-Service Testing Program or the Primary Containment Leakage Rate Testing Program);
- Frequencies that are purely event driven (e.g., ''each time the control rod is withdrawn to the 'full out' position'');
- Frequencies that are event-driven but have a time component for performing the surveillance on a one-time basis once the event occurs (e.g., ''within 24 hours after thermal power reaching ≥ 95 percent RTP''); and
- Frequencies that are related to specific conditions (e.g., battery degradation, age and capacity) or conditions for the performance of a surveillance requirement (e.g., ''drywell to suppression chamber differential pressure decrease'')."

1) The TSTF should be prepared to discuss how the Battery Service and Performance Discharge Test Surveillance Requirements do not meet the exception noted above.
2) The TSTF should also provide examples of changes to Surveillance Frequencies that have occurred that are greater than recommended by an industry standard or vendor manual. The staff would like the TSTF to discuss the considerations that are needed to extend a surveillance frequency beyond the recommendations/requirements of an industry standard or vendor manual.
3) The TSTF should also be prepared to discuss any caps associated with extending surveillance frequencies.