

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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LCOs                      Limiting Condition for Operation (LCO) 3.0.1 through LCO 3.0.9 establish the general requirements applicable to all Specifications and apply at all times unless otherwise stated.

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LCO 3.0.1                Limiting Condition for Operation 3.0.1 establishes the Applicability statement within each individual Specification 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).

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LCO 3.0.2                Limiting Condition for Operation 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 when 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:

- a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and
- b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit for meeting the LCO. 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, permitting continued operation of the unit, that are not further restricted by the Completion Time. In this case,

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compliance with the Required Actions provides an acceptable level of safety for continued operation.

Completing the Required Actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual Specifications.

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 (e.g., LCO 3.4.3).

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 Surveillance Requirements (SRs), 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. Doing so limits the time both subsystems/trains of a safety function are inoperable and limits the time conditions exist that may result in LCO 3.0.3 being entered. Individual Specifications may state 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 when the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

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LCO 3.0.3 **Limiting Condition for Operation** 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.

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 well within the specified maximum cooldown rate and capabilities of the unit, assuming 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 the 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.

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

The time limits of Specification 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, the time allowed for reaching MODE 4 is the next 11 hours, because the total time for reaching 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.

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 3.7.13. Limiting Condition for Operation 3.7.13 has an Applicability of "During movement of

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irradiated fuel assemblies in the spent fuel pool." Therefore, this LCO can be applicable in any or all MODEs. If the LCO and the Required Actions of LCO 3.7.13 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 3.7.13 of "Suspend movement of irradiated fuel assemblies in spent fuel 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.

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LCO 3.0.4

Limiting Condition for Operation 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.

Limiting Condition for Operation 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.

Limiting Condition for Operation 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.

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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 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 contain 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.

Limiting Condition for Operation 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 system and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

Limiting Condition for Operation 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., Pressurizer), 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

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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.

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 SRs 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.

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LCO 3.0.5

Limiting Condition for Operation 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.

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.



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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.

The Nuclear Regulatory Commission (NRC) staff has provided a Technical Specification interpretation for LCO 3.0.5 in a letter from D. V. Pickett (NRC) to G. H. Gellrich (CCNPP), dated December 20, 2011. The NRC staff concluded that Technical Specification Required Actions 3.3.7.B.1, 3.3.8.A.1, 3.4.11.A.1, 3.4.11.C.1, 3.7.3.A.1, and 3.7.8.A.1 are within the scope of the administrative controls applied by LCO 3.0.5 for the purpose of realignment of components needed for conducting the operability testing on equipment, so long as the testing could not be conducted while relying on the Technical Specification Required Actions. This includes repositioning of redundant or alternate equipment or trains previously manipulated to comply with the Technical Specification Required Action. The NRC staff further concluded that LCO 3.0.5 would apply in all cases to systems or components in Section 3 of the Technical Specifications.

LCO 3.0.6

Limiting Condition for Operation 3.0.6 establishes an exception to LCO 3.0.2 for support systems that have an LCO specified in the Technical Specifications. This exception is provided because LCO 3.0.2 would require the Conditions and Required Actions of the associated inoperable supported system LCO to be entered solely due to the inoperability of the support system. This exception is justified because the actions 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 Technical Specification, the supported system(s) are required to be declared inoperable if they are 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' and Required Actions are eliminated by providing all the actions 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, "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 a 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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Cross-train checks to identify a loss of safety function for those support systems supporting 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. A loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or

EXAMPLE B3.0.6-1

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.

- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

EXAMPLE B3.0.6-2

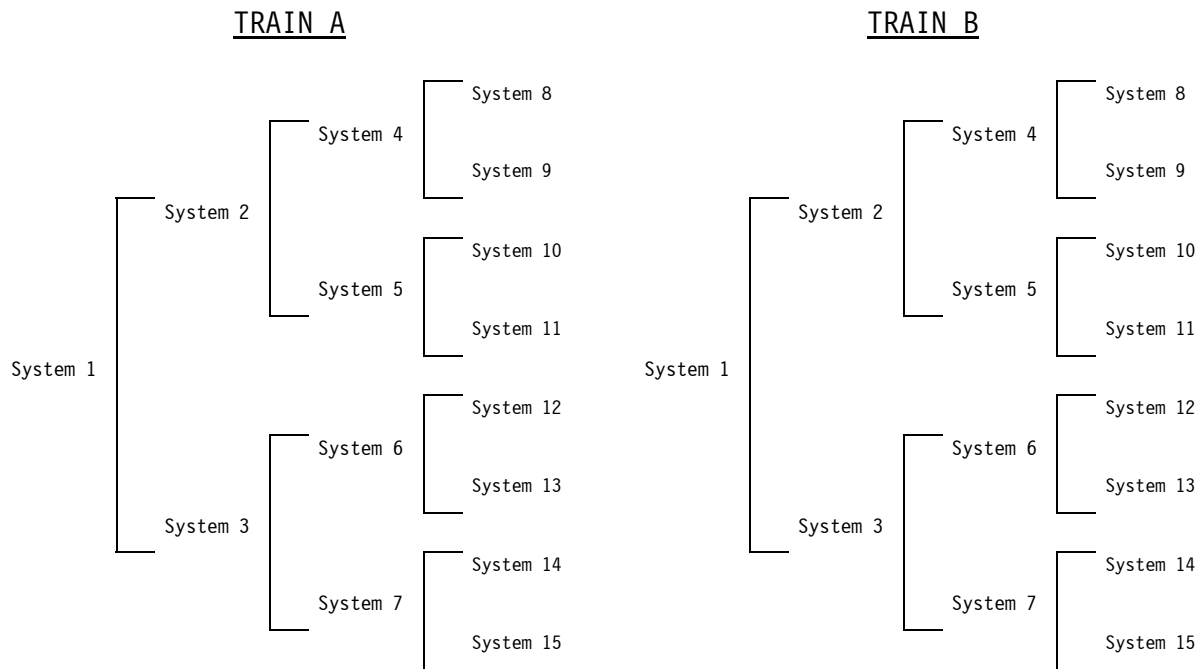
If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a loss of safety function exists in System 11, which is in turn supported by System 5.

- c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable.

EXAMPLE B3.0.6-3

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.

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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.

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. Special Test Exception (STE) LCOs 3.1.7, 3.1.8, and 3.4.17 allow specific Technical Specification requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with these Technical Specifications. Unless otherwise specified, all the other Technical Specification 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 STE LCO represents a condition not necessarily in compliance with the normal requirements of

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the Technical Specification. Compliance with STE LCOs is optional. A special operation may be performed either under the provisions of the appropriate STE LCO or under the other applicable Technical Specification requirements. If it is desired to perform the special operation under the provisions of the STE LCO, the requirements of the STE LCO shall be followed.

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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 seismic-designated 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 in the Technical Requirements Manual (TRM). The snubber requirements do not meet the criteria in 10 CFR 50.36(d)(2)(ii), and, as such, are appropriate for control by the TRM.

The allowances in this LCO apply only to seismic snubbers. In adding the LCO to the Technical Specifications, the Nuclear Regulatory Commission (NRC) based their decision on a risk analysis. That analysis considered an earthquake-induced loss-of-offsite power and did not consider other dynamic loading, such as waterhammer. Therefore, the LCO is also applicable to snubbers that have the dual function of seismic and other dynamic loading if the train is not inoperable for any reason other than a lack of seismic support.

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

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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 of a single train system. The supported system must not be inoperable for any reason other than a lack of seismic support. The LCO 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. For example, if multiple inoperable snubbers affect separate trains of a system or one inoperable snubber affects multiple trains of a system, LCO 3.0.8.b is applicable. The supported system must not be inoperable for any reason other than a lack of seismic support. The LCO 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.

LCO 3.0.8 requires that risk be assessed and managed. Industry and the 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 must be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance of 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

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snubbers are not able to perform their associated support function.

The NRC placed several conditions on the use of LCO 3.0.8:

- a. When LCO 3.0.8.a is used, one auxiliary feedwater (AFW) train not associated with the inoperable snubber must be available for core cooling.
  - b. When LCO 3.0.8.b is used, either one AFW train not associated with the inoperable snubber or some alternative means of cooling the core must be available (e.g., once-through core cooling).
  - c. When the provisions of LCO 3.0.8 are used, at least one train of the supported system must be capable of performing the required safety or support function(s) for postulated loads other than seismic loads.
  - d. A record of the design function of the inoperable snubber (i.e., seismic versus non-seismic), the implementation of any of these conditions, and the associated plant configuration shall all be available on a recoverable basis for NRC inspection.
  - e. When entering LCO 3.0.8, risk must be assessed and managed. The Maintenance Rule program complying with 10 CFR 50.65(a)(4) satisfies this condition.
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LCO 3.0.9

LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the

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supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

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

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65(a)(4), and the associated implementation guidance, Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear



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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." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with

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the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

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## B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

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SRs                      Surveillance Requirement 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

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SR 3.0.1                Surveillance Requirement 3.0.1 establishes 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 surveillance tests are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a SR within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO.

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:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the surveillance test(s) are known to not be met between required surveillance test performances.

Surveillance tests 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 STE are only applicable when the STE is used as an allowable exception to the requirements of a Specification.

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.

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Surveillance tests, including surveillance tests invoked by Required Actions, do not have to be performed on inoperable equipment, because the ACTIONS define the applicable remedial measures. Surveillance tests have to be performed in accordance with SR 3.0.2 prior to returning equipment to OPERABLE status.

Upon completion of maintenance, appropriate post-maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable surveillance tests pass 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.

Some examples of this process are:

- a. Auxiliary feedwater pump turbine maintenance during refueling that requires testing at steam pressures > 800 psi. However, if other appropriate testing is satisfactorily completed, the Auxiliary Feedwater 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 maintenance during shutdown that requires system functional tests at a specified pressure. Provided other appropriate testing is satisfactorily completed, startup can proceed with high pressure safety injection considered OPERABLE. This allows operation to reach the specified pressure to complete the necessary post-maintenance testing.
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SR 3.0.2            Surveillance Requirement 3.0.2 establishes the requirements for meeting the specified Frequency for surveillance tests and any Required Action with a Completion Time that requires the periodic performance of the Required Action on a "once per . . ." interval.

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

The 25% extension does not significantly degrade the reliability that results from performing the surveillance test at its specified Frequency. This is based on the recognition that the most probable result of any particular surveillance test being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those surveillance tests for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. An example of where SR 3.0.2 does not apply is the Containment Leakage Rate Testing Program.

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 test 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 test intervals (other than those consistent

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with refueling intervals) or periodic Completion Time intervals beyond those specified.

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SR 3.0.3            Surveillance Requirement 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance test 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 when it is discovered that the surveillance test has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

This delay period provides an adequate time to complete missed surveillance tests. This delay period permits the completion of a surveillance test before complying with Required Actions or other remedial measures that might preclude completion of the surveillance test.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance test, the safety significance of the delay in completing the surveillance test, and the recognition that the most probable result of any particular surveillance test being performed is the verification of conformance with the requirements.

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 Part 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

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missed Surveillance should be performed at the first reasonable opportunity.

Surveillance Requirement 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 that is not intended to be used as an operational convenience to extend surveillance test 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

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Surveillances will be placed in the licensee's Corrective Action Program.

If a surveillance test is not completed within the allowed delay period, 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 test fails within the delay period, 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 test.

Completion of the surveillance test within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

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SR 3.0.4

Surveillance Requirement 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 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 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 instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. Surveillance Requirement 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 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

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reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

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