

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes Related to SR 3.0, Surveillance Requirement (SR) Applicability

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

TSTF-359-A, Rev 9, Increase Flexibility in MODE Restraints
TSTF-434-A, Rev 0, Clarifying SR 3.0.1 Bases to state that Surveillance can be performed in steps

STS NUREGs Affected:

TSTF-359-A, Rev 9: NUREGs 1430, 1431, 1432, 1433, and 1434
TSTF-434-A, Rev 0: NUREGs 1430, 1431, 1432, 1433, and 1434

NRC Approval Date:

TSTF-359-A, Rev 9: 12-May-03
TSTF-434-A, Rev 0: 10-Oct-02

TSTF Classification:

TSTF-359-A, Rev 9: Technical Change
TSTF-434-A, Rev 0: Change Bases

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

There are no Vogtle Electric Generating Plant Units 3 and 4 (Vogtle or VEGP) departures applicable to GTS SR 3.0.

RCOL COL Item Number and Title:

There are no Vogtle COL items applicable to GTS SR 3.0.

RCOL PTS Change Number and Title:

The VEGP License Amendment Request (LAR) proposed the following changes to the initial version of the PTS (referred to as the current TS by the VEGP LAR). These changes include Administrative Changes (A), Detail Removed Changes (D), Less Restrictive Changes (L), and More Restrictive Changes (M). These changes are discussed in Sections VI and VII of this GTST.

VEGP LAR DOC A005: Editorial Corrections

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses changes: (1) that were applicable to previous designs, but are not to the current design; (2) that are already incorporated in the GTS; and (3) that are superseded by another change.

None

IV. Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)

None

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

Changes to the Generic Technical Specifications and Bases:

The word “Conditions” in SR 3.0.1 is revised to be all lower case. This change is consistent with NUREG-1431, WOG STS Rev. 4. (DOC A005)

The SR 3.0.1 Bases are revised to state that Surveillances may be performed by means of any series of sequential, overlapping, or total steps. It is an accepted practice that any Surveillance can be performed by means of any series of sequential, overlapping, or total steps as long as the entire Surveillance is performed as specified in the TS. (TSTF-434-A)

SR 3.0.4 and Bases are revised to note that when an LCO is not met due to a Surveillance not being met, MODE changes are subject to the revised provisions of LCO 3.0.4. Points a, b, and c are added to LCO 3.0.4 and associated Bases discussion regarding when entry into a higher MODE is permissible. The clarified statement of LCO 3.0.4 eliminates the need for many LCO 3.0.4 exceptions in many LCOs. (TSTF-359-A)

VI. Traveler Information

Description of TSTF changes:

The SR 3.0.1 Bases are revised by TSTF-434-A, Rev. 0 to state that Surveillances may be performed by means of any series of sequential, overlapping, or total steps. This reflects an accepted industry practice. However, certain Surveillance related Definitions explicitly state that those Surveillances may be performed by any series of sequential, overlapping, or total steps. This infers that the practice must be explicitly allowed. To avoid confusion, the Bases of SR 3.0.1 are revised to explicitly acknowledge this practice.

AP1000 GTS LCO 3.0.4 is revised by TSTF-359-A, Rev. 9 to allow entry into a MODE or other specified condition in the Applicability while relying on the associated ACTIONS, provided that there is a risk assessment performed which justifies the use of LCO 3.0.4, the ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time, or an NRC approved allowance is provided in the Specification to be entered. The current AP1000 GTS LCO 3.0.4 allows entry into a MODE or a specified condition in the Applicability, while relying on the associated ACTIONS, only if the ACTIONS permit continued operation in the MODE or other specified condition in the Applicability for a unlimited period of time, or if an NRC approved allowance is provided in the Specification to be entered. SR 3.0.4 is revised to reflect the concepts of the change to LCO 3.0.4. The applicability of LCO 3.0.4 and SR 3.0.4 is expanded to include transition into all MODES or other specified conditions in the Applicability, except when required to comply with ACTIONS or that are part of a shutdown of the unit. As a result, many LCO exceptions to LCO 3.0.4 are eliminated or revised.

Rationale for TSTF changes:

The definitions related to instrument testing, such as CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, and CHANNEL OPERATIONAL TEST, contain a sentence stating that the tests may be performed by means of any series of sequential, overlapping, or total steps. TSTF-205, Rev. 3, which has been approved by the NRC, added this phrase to instrument testing-related definitions from which it had been omitted.

It is an accepted practice that any Surveillance can be performed by means of any series of sequential, overlapping, or total steps as long as the entire Surveillance is performed as specified in the TS. However, the inclusion of explicit allowances to perform CHANNEL CALIBRATIONS, CHANNEL FUNCTIONAL TESTS, and CHANNEL OPERATIONAL TESTS by means of any series of sequential, overlapping, or total steps implies that this allowance is not provided for any other types of surveillances. Without the proposed general clarification to SR 3.0.1, this practice could be construed to be a violation of some SRs.

TSTF-359-A reflects the allowances of LCO 3.0.4, which are based on NRC Generic Letter 87-09. GL 87-09 indicates that with respect to unnecessary restrictions on MODE changes, "Specification LCO 3.0.4 unduly restricts facility operation when conformance with Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operation MODE or other specified condition of operation should be permitted in accordance with the Action Requirements." This is still overly restrictive. For example, the startup of a unit could be delayed due to the current restrictions of LCO 3.0.4. A single maintenance activity that is almost complete could cause significant delays and changes in a

previously well thought out plan for returning the unit to service. In such situations, allowing the unit to enter the MODE or other specified condition in the Applicability would allow the work to be completed while reducing the likelihood of human error caused by expediting the completion of required Surveillances and maintenance activities. Therefore, application of TSTF-359-A to the AP1000 GTS provides necessary standardization and consistency to the use and application of LCO 3.0.4.

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP LAR DOC A005 revises SR 3.0.1 by rendering the word “Condition” to all lower case text.

A more detailed description of the changes by each of the above DOCs can be found in Reference 2, VEGP TSU LAR in Enclosure 1; the NRC staff safety evaluation can be found in Reference 3, VEGP LAR SER. The VEGP TSU LAR was modified in response to NRC staff RAIs (Reference 7) by Southern Nuclear Operating Company’s RAI Response in Reference 8.

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

“Conditions” is initial capitalized when referring to the Action Column heading “Condition.” Conditions of the Applicability are not referred to as a “titled” condition. This change is consistent with NUREG-1431 Standard TS.

Description of additional changes proposed by NRC staff/preparer of GTST:

Not Applicable

Rationale for additional changes proposed by NRC staff/preparer of GTST:

Not Applicable

VII. GTST Safety Evaluation

Technical Analysis:

TSTF-434-A documents that Surveillances may be performed by means of any series of sequential, overlapping, or total steps. SR 3.0.1 is established to require that Surveillances be met. The Definitions of the terms "CHANNEL CALIBRATION," "CHANNEL FUNCTIONAL TEST," and "CHANNEL OPERATIONAL TEST" contain the sentence, "The [CHANNEL CALIBRATION, CHANNEL FUNCTIONAL TEST, or CHANNEL OPERATIONAL TEST] may be performed by means of any series of sequential, overlapping, or total channel steps."

It is logical to infer that the inclusion of this statement in those definitions is necessary to allow the corresponding Surveillances to be performed in the manner described. Otherwise, there would be no reason to include the statements in the definitions. It is also logical to infer that the absence of such a qualification means that the allowance to perform other Surveillances in this manner is not available.

However, there is no reason why all Surveillances cannot be performed by means of a series of sequential, overlapping, or total channel steps. Surveillances are routinely performed in overlapping or sequential pieces for reasons such as avoiding the actuation of equipment which should not be run during power operation, improving scheduling and resource management, and reducing plant risk by scheduling when equipment is out of service.

The change to the SR 3.0.1 Bases does not provide any additional flexibility than is routinely assumed to apply currently, but clarifies that the existing practices are acceptable.

TSTF-359-A allows entry into a higher mode of operation, or other specified condition in the TS applicability, while relying on the TS conditions, and associated required actions and completion times, provided a risk assessment is performed to confirm the acceptability of that action. TS have taken advantage of risk technology as experience and capability have increased. The proposal revises STS LCO 3.0.4 and SR 3.0.4, and their application to the TS. New paragraphs (a), (b), and (c) are proposed for LCO 3.0.4.

LCO 3.0.4(a) retains the current allowance, permitting the mode change when the TS required actions allow indefinite operation.

The addition of LCO 3.0.4(b), which allows entry into a MODE or other specified condition in the Applicability while relying on ACTIONS based on a risk assessment, is reasonable based on many factors. The licensee, and particularly the licensee management, is always responsible for maintaining overall plant configuration and safety. Developments in the Maintenance Rule and other industry/NRC initiatives (including the configuration risk management programs) enhance the tools available to licensees to assess the risk associated with various plant configurations. This change is a logical step of requiring licensees to assess the application of LCO 3.0.4 allowances in light of the newly available tools and information.

The risk assessment may consider a variety of factors, but will focus on managing plant risk. Consideration would be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the ACTIONS requiring that the Applicability be exited. The assessment may also establish appropriate compensatory measures to enhance safe and effective operations until restoration of compliance with the LCO. The proposed change would provide the flexibility of not restricting which MODES can be entered while relying

on the ACTIONS, as do the current LCO 3.0.4 exceptions, but would add the requirement to assess the risks prior to making the MODE change when using LCO 3.0.4(b).

When an LCO is not met, the licensee must restore compliance with the LCO consistent with the requirements of the TS. This restoration may include corrective maintenance. 10 CFR 50.65 requires that licensees assess the effect equipment maintenance will have on the plant's capability to perform safety functions before beginning any maintenance activity on structures, systems, or components within the scope of the maintenance rule. Plant procedures must be in place to implement 10 CFR 50.65(a)(4) to address the situation where entering a mode or other specified condition in the applicability is contemplated with plant equipment inoperable. Such plant procedures typically follow the guidance in NUMARC 93-01, Section 11, as revised in February 2000 and endorsed by NRC RG 1.182.

The LCO 3.0.4(b) allowance does not apply to values and parameters of the TS that have their own respective LCOs (e.g., Reactor Coolant System Specific Activity), but instead those values and parameters are addressed by LCO 3.0.4(c). The LCO 3.0.4(c) allowances apply to parameters and values which have been previously approved by the NRC in a plant's specific TS. The licensee will provide in their TS Bases a discussion and list of each NRC-approved, LCO 3.0.4(c)-specific value and parameter allowance. The risk assessments performed to justify the use of LCO 3.0.4(b) usually only consider systems and components. For this reason, LCO 3.0.4(c) is typically applied to Specifications which describe values and parameters (e.g., [Containment Air Temperature, Containment Pressure, Moderator Temperature Coefficient]), and may be applied to other Specifications based on NRC plant-specific approval. The TS values and parameters, for which mode transition allowances apply, will have a note that states LCO 3.0.4(c) is applicable.

Accident analyses presented in the FSAR do not address the effects of the plant being in ACTIONS. The accident analyses assume that the necessary equipment is available and then, in most cases, assumes the single most limiting active failure occurs. It is this assumption that leads to limiting the length of Completion Times in order to minimize the length of time that the plant is not within the initial conditions of the accident analysis. This change does not affect the Completion Times. Therefore, this proposal would not affect the accident analyses and is therefore acceptable.

The remaining changes are editorial, clarifying, grammatical, or otherwise considered administrative. These changes do not affect the technical content, but improve the readability, implementation, and understanding of the requirements, and are therefore acceptable.

References to Previous NRC Safety Evaluation Reports (SERs):

VEGP LAR SER (GTST Reference 3)

TSTF-359-A: Federal Register /Vol. 68, No. 65 / Friday, April 4, 2003 /Notices (GTST Reference 5)

VIII. Review Information

Evaluator Comments:

None

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on Friday, June 06, 2014.

NRC Final Approval Date:

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

The database does not yet recognize non-breaking hyphens or spaces. For Rev. 0 of this GTST, it was necessary to manually insert (1) non-breaking hyphens as necessary to interlock designations such as P-10 to avoid breaking across the end of a line; and (2) non-breaking spaces as necessary to (a) keep symbols such as “≥” with the subsequent value; and (b) avoid stranding a number value on a subsequent line, such as MODE 5.

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:
 - ML13238A355 Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).
 - ML13238A359 Enclosure 1 - Amendment No. 13 to COL No. NPF-91
 - ML13239A256 Enclosure 2 - Amendment No. 13 to COL No. NPF-92
 - ML13239A284 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)
 - ML13239A287 Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms
 - ML13239A288 SE Attachment 2 - Table A - Administrative Changes
 - ML13239A319 SE Attachment 3 - Table M - More Restrictive Changes
 - ML13239A333 SE Attachment 4 - Table R - Relocated Specifications
 - ML13239A331 SE Attachment 5 - Table D - Detail Removed Changes
 - ML13239A316 SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

 - ML13277A616 Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)
 - ML13277A637 Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected)
4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
5. TSTF-359-A: Federal Register /Vol. 68, No. 65 / Friday, April 4, 2003 /Notices
6. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005.
7. RAI Letter No. 01 Related to License Amendment Request (LAR) 12-002 for the Vogtle Electric Generating Plant Units 3 and 4 Combined Licenses, September 7, 2012 (ML12251A355).

8. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360)
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XI. MARKUP of the Applicable GTS Section for Preparation of the STS NUREG

The entire section of the Specifications and the Bases associated with this GTST is presented next.

Changes to the Specifications and Bases are denoted as follows: Deleted portions are marked in strikethrough red font, and inserted portions in bold blue font.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified **conditions** ~~Conditions~~ in the Applicability of individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the surveillance or between performances of the Surveillance, shall be a failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

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

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

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, which ever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period, and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

SR Applicability

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of **an a** LCO shall **only not** be made **when unless** the LCO's Surveillances have been met within their specified Frequency, **except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.**

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

~~SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, 3, and 4.~~

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

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

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification ensures that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. **Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.**

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(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

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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SR 3.0.1 (continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met 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 Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

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

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

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

BASES

SR 3.0.2 (continued)

Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a “once per ...” basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed, in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before compliance with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit Conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of

BASES

SR 3.0.3 (continued)

any particular Surveillance 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 or operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity. SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

BASES

SR 3.0.3 (continued)

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this specification, or within the Completion Time of the ACTIONS restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

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.

~~The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or component to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.~~

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

BASES

SR 3.0.4 (continued)

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. **SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.**

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

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 a 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 Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a NOTE as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SR's annotation is found in Section 1.4, Frequency.

~~SR 3.0.4 is only applicable when entering MODE 4 from MODE 5, MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, 3, or 4. The requirements of SR 3.0.4 do not apply in MODES 5 and 6, or 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.~~

XII. Applicable STS Subsection After Incorporation of this GTST's Modifications

The entire subsection of the Specifications and the Bases associated with this GTST, following incorporation of the modifications, is presented next.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability of individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the surveillance or between performances of the Surveillance, shall be a failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

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

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

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, which ever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period, and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

SR Applicability

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

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

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

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

SR 3.0.1 SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification ensures that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.

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(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the test exception is used as an allowable exception to the requirements of a Specification.

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.

BASES

SR 3.0.1 (continued)

Surveillances, including Surveillances invoked by Required Actions, do not have to be performed on inoperable equipment because the ACTIONS define the remedial measures that apply. Surveillances have to be met 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 Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

SR 3.0.2

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

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

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

BASES

SR 3.0.2 (continued)

Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per ..." basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly merely as an operational convenience to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed, in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before compliance with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit Conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of

BASES

SR 3.0.3 (continued)

any particular Surveillance 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 or operational situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to not have been performed when specified, SR 3.0.3 allows for the full delay period of up to the specified Frequency to perform the Surveillance. However, since there is not a time interval specified, the missed Surveillance should be performed at the first reasonable opportunity. SR 3.0.3 provides a time limit for, and allowances for the performance of, Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals. While up to 24 hours or the limit of the specified Frequency is provided to perform the missed Surveillance, it is expected that the missed Surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the Surveillance as well as any plant configuration changes required or shutting the plant down to perform the Surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the Surveillance. This risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, 'Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants.' This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed Surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed Surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed Surveillances will be placed in the licensee's Corrective Action Program.

BASES

SR 3.0.3 (continued)

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this specification, or within the Completion Time of the ACTIONS restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

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. SR 3.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 3.0.3.

BASES

SR 3.0.4 (continued)

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

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 a 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 Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a NOTE as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SR's annotation is found in Section 1.4, Frequency.
