William G. Hettel
Vice President, Operations
P.O. Box 968, Mail Drop PE23
Richland, WA 99352-0968
Ph. 509-377-8311 F. 509-377-4674
wghettel@energy-northwest.com

10 CFR 50.90

September 2, 2015
GO2-15-070

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

Subject: **COLUMBIA GENERATING STATION, DOCKET NO. 50-397
APPLICATION FOR TECHNICAL SPECIFICATION CHANGE (TSTF-427)
TO ADD LCO 3.0.9 ON THE UNAVAILABLITY OF BARRIERS USING
THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP)**

Dear Sir or Madam:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), Energy Northwest is submitting a request for an amendment to the Technical Specifications (TS) for Columbia Generating Station (Columbia).

The proposed amendment would revise the TS requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9. This LCO establishes conditions under which TS systems would remain operable when required physical barriers are not capable of providing their related safety function. Additionally, editorial changes are proposed to LCO 3.0.8 to be consistent with the terminology proposed in LCO 3.0.9.

The following attachments are included in support of this request:

- Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant specification verifications.
- Attachment 2 provides a summary of the regulatory commitments made in this submittal
- Attachment 3 provides the existing TS pages marked up to show the proposed change.
- Attachment 4 provides the existing TS Bases pages marked up to show the proposed change (information only).
- Attachment 5 provides revised (clean) TS pages.

Energy Northwest requests approval of the proposed License Amendment one year from the date of submittal, with the amendment being implemented within 60 days.

.

In accordance with 10 CFR 50.91, a copy of this application with attachments is being provided to the designated Washington State Official.

If you should have any questions regarding this submittal, please contact Ms. L. L. Williams, Licensing Supervisor, at 509-377-8148.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on SEPTEMBER 2, 2015

Respectfully,

W. G. Hettel
Vice President, Operations

Attachments: As stated

cc: NRC Region IV Administrator
NRC NRR Project Manager
NRC Sr. Resident Inspector - 988C
CD Sonoda - BPA - 1399 (w/o enclosures)
WA Horin - Winston & Strawn (email)
RR Cowley - WDOH (email)
JO Luce - EFSEC (email)

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) STS change TSTF-427-A, Revision 2. The availability of the TS improvement was published in the *Federal Register* on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Energy Northwest has reviewed the safety evaluation dated October 3, 2006 (71 FR 58444) as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as supporting information provided to support TSTF-427. Energy Northwest has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Columbia Generating Station (Columbia) and justify this amendment for incorporation of the changes to the Columbia TS.

2.2 Optional Changes and Variations

Energy Northwest is not proposing any variations or deviations from the TS changes described in the TSTF-427 Revision 2 or the NRC staff's model safety evaluation dated October 3, 2006 (71 FR 58444). However, one editorial variation incorporated in the proposed TS change replaces all occurrences of the term "train" in the proposed LCO 3.0.9 in TSTF-427 Revision 2, with the term "division" to be consistent with the Columbia TS definition of "OPERABLE-OPERABILITY" and the terminology used in Section 1.3, "Completions Times," of Columbia's TS.

In addition, a similar change to replace the term "train" with the term "division" is proposed for LCO 3.0.8. LCO 3.0.8 was added to the Columbia TS with the adoption of TSTF-372 per License Amendment 198 approved on September 6, 2006.

On November 27, 2012, the NRC published a Federal Register Notice stating that Regulatory Guide (RG) 1.182 has been withdrawn and the subject matter has been incorporated into RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." (77 FR 70846). RG 1.160 endorses Revision 4A of NUMARC 93-01, dated April 2011. TSTF-427 and the proposed Bases, the model application and commitments, the model Safety Evaluation, and the implementation guidance reference RG 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants," which endorses the February 2000 version of NUMARC 93-01, "Monitoring the

Effectiveness of Maintenance at Nuclear Power Plants." References and commitments to RG 1.182 in these documents are assumed to refer to RG 1.160 and Revision 4A of NUMARC 93-01 instead of RG 1.182. References to RG 1.182 in the Technical Specification Bases and model application have been revised to refer to RG 1.160.

3.0 REGULATORY ANALYSIS

3.1 No significant Hazards Consideration Determination

Energy Northwest has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. Energy Northwest has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to Columbia and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and commitments

As discussed in the notice of availability published in the Federal Register on October 3, 2006 (71 FR 58444) for this TS improvement, plant-specific verifications were performed. Plant specific regulatory commitments are as follows and set out in Attachment 2:

1. Energy Northwest commits to the guidance of NUMARC 93-01 Section 11, Revision 4A, which provides guidance and details on the assessment and management of risk during maintenance.

2. Energy Northwest will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall Configuration Risk Management Program (CRMP) to ensure that the potentially risk significant configurations resulting from maintenance and other operational activities are identified and avoided.

3.3. Precedent

The NRC has approved TSTF-427 editorial variations similar to those described in "Section 2.2 Optional Changes and Variations" for a number of plants.

1. Letter from A Muñiz (U.S. Nuclear Regulatory Commission) to J.M. Davis (Detroit Edison Company), Fermi 2 – Issuance of Amendment RE: Consolidated Line Item Improvement Process (CLIIP) Application for Technical Specification Change (TSTF-427) to Add Limiting Condition for Operation (LCO) 3.0.9 Regarding the Unavailability of Barriers (TAC No. MD4434), dated August 1, 2007 (ADAMS Accession No. ML071490013).

2. Letter from P.S. Tam (U.S. Nuclear Regulatory Commission) to T.J. O'Connor (Northern States Power Company), Monticello Nuclear Generating Plant – Issuance

of Amendment to Add New Limiting Condition for Operation 3.0.9 Regarding Unavailability of Barriers (TAC No. MD9490), dated October 22, 2008 (ADAMS Accession No. ML082550109).

4.0 ENVIRONMENTAL EVALUATION

Energy Northwest has reviewed the environmental evaluation included in the model safety evaluation dated October 3, 2006 (71 FR 58444) as part of the CLIIP. Energy Northwest has concluded that the staff's findings presented in that evaluation are applicable to Columbia and the evaluation is hereby incorporated by reference for this application.

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by Energy Northwest in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Ms. L. L. Williams, Licensing Supervisor, at 509-377-8148.

REGULATORY COMMITMENTS	DUE DATE/EVENT
Energy Northwest commits to the guidance of NUMARC 93-01 Section 11, Revision 4A, which provides guidance and details on the assessment and management of risk during maintenance.	Ongoing.
Energy Northwest will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied, in accordance with an overall Configuration Risk Management Program (CRMP) to ensure that the potentially risk significant configurations resulting from maintenance and other operational activities are identified and avoided.	Implement with amendment, when barrier(s) are unavailable.

GO2-15-070
Attachment 3

PROPOSED TECHNICAL SPECIFICATIONS CHANGES (MARK-UPS)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1	LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, ~~and~~ LCO 3.0.8, and LCO 3.0.9.
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in: a. MODE 2 within 7 hours; b. MODE 3 within 13 hours; and c. MODE 4 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, and 3.
LCO 3.0.4	When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. 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; b. 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; exceptions to this Specification are stated in the individual Specifications, or

LCO Applicability

LCO 3.0.8	When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and: a. The snubbers not able to perform their associated support function(s) are associated with only one ~~train~~ division or subsystem of a multiple ~~train~~ division or subsystem supported system or are associated with a single ~~train~~ division or subsystem supported system and are able to perform their associated support function within 72 hours; or b. The snubbers not able to perform their associated support function(s) are associated with more than one ~~train~~ division or subsystem of a multiple ~~train~~ division or subsystem supported system and are able to perform their associated support function within 12 hours. At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.
LCO 3.0.9	When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one division or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one division or subsystem of a multiple division or subsystem supported system provided at least one division or subsystem of the supported system is OPERABLE and the barriers supporting each of these divisions or subsystems provide their related support function(s) for different categories of initiating events. For the purposes of this specification, the High Pressure Core Spray (HPCS) system, the Reactor Core Isolation Cooling (RCIC) system, and the Automatic Depressurization System (ADS) are considered independent subsystems of a single system. If the required OPERABLE division or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the divisions or subsystems supported by the barriers that cannot perform their related support function(s). At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

PROPOSED TECHNICAL SPECIFICATIONS BASES CHANGES (MARK-UPS)
(INFORMATION ONLY)

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~9 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement 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).
LCO 3.0.2	LCO 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 from the point in time that 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 that: 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 in which the LCO must be met. 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 that permit continued operation of the unit that is not further restricted by the Completion Time. In this case, 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.

BASES

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 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 under licensee control. The snubber requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii), and, as such, are appropriate for control by the licensee.

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

LCO 3.0.8 only applies to snubber support functions that are seismic related. In MODES 4 and 5, snubbers only perform seismic support functions. In MODES 1, 2, and 3, some snubbers inside the drywell and in the Turbine Building also perform non-seismic support functions (e.g., hydrodynamic loads, turbine trip loads, etc.). These snubbers are normally inaccessible in MODES 1, 2, and 3.

For snubbers that are being addressed in accordance with this LCO, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), the implementation of any applicable restrictions, and the associated plant configuration must all be available on a recoverable basis for NRC inspection.

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~~ division or subsystem of a multiple ~~train~~ division or subsystem supported system or to a single ~~train~~ division or subsystem supported system. LCO 3.0.8.a 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~~ division of the supported system.

BASES

LCO 3.0.8 (continued)

When LCO 3.0.8.a is used, one of the following two means of heat removal must be available:

- At least one high-pressure makeup path (i.e., using high-pressure core spray or reactor core isolation cooling) and heat removal capability (e.g., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or

- At least one low-pressure makeup path (e.g., low-pressure coolant injection or core spray) and heat removal capability (e.g., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s).

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~~ division or subsystem of a multiple ~~train~~ division or subsystem supported system. LCO 3.0.8.b 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.

When LCO 3.0.8.b is used, it must be verified that at least one success path exists, using equipment not associated with the inoperable snubber(s), to provide makeup and core cooling needed to mitigate loss of offsite power (LOOP) accident sequences.

LCO 3.0.8 requires that risk be assessed and managed. Industry and 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 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected ~~train~~ division 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 snubbers are not able to perform their associated support function.

BASES

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 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 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.

BASES

LCO 3.0.9 (continued)

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 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 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). Additionally, the Risk Assessment and Management Considerations described in NEI 04-08 must be used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9 are to be applied. 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 divisions 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 division or subsystem of a multiple division or subsystem supported system, the barriers supporting each of these divisions 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 division of a multiple division supported system if the affected barrier for one division protects against internal flooding and the affected barrier of the other division protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each division.

The HPCS (High Pressure Core Spray) and RCIC (Reactor Core Injection Cooling) systems are single division systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCS system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCS system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCS system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single division systems in a manner similar to multiple division or subsystem systems.

BASES

LCO 3.0.9 (continued)

If during the time that LCO 3.0.9 is being used, the required OPERABLE division or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the division(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 the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

PROPOSED TECHNICAL SPECIFICATIONS CHANGES (CLEAN)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1	LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in: a. MODE 2 within 7 hours; b. MODE 3 within 13 hours; and c. MODE 4 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, and 3.
LCO 3.0.4	When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made: a. 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; b. 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; exceptions to this Specification are stated in the individual Specifications, or

LCO Applicability

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. The snubbers not able to perform their associated support function(s) are associated with only one division or subsystem of a multiple division or subsystem supported system or are associated with a single division or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. The snubbers not able to perform their associated support function(s) are associated with more than one division or subsystem of a multiple division or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one division or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one division or subsystem of a multiple division or subsystem supported system provided at least one division or subsystem of the supported system is OPERABLE and the barriers supporting each of these divisions or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Core Spray (HPCS) system, the Reactor Core Isolation Cooling (RCIC) system, and the Automatic Depressurization System (ADS) are considered independent subsystems of a single system.

If the required OPERABLE division or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the divisions or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.