

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

Title: Revision of AP1000 GTS Section 1.4, Frequency

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-475-A, Rev. 1: Control Rod Notch Testing Frequency and SRM Insert Control Rod Action

TSTF-485-A, Rev. 0: Correct Example 1.4-1

STS NUREGs Affected:

TSTF-475-A, Rev. 1: NUREG-1430, -1431, -1432, -1433, -1434

TSTF-485-A, Rev. 0: NUREG-1430, -1431, -1432, -1433, -1434

NRC Approval Date:

TSTF-475-A, Rev. 1: 13-Nov-07

TSTF-485-A, Rev. 0: 06-Dec-05

TSTF Classification:

TSTF-475-A, Rev. 1: Correct Specifications

TSTF-485-A, Rev. 0: Editorial Change

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:

None

RCOL COL Item Number and Title:

None

RCOL PTS Change Number and Title:

None

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

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

TSTF-475-A, Rev. 1 revised the text in Example 1.4-3 of the WOG STS 1.4, Rev. 3.1. This is accomplished by adding the phrase “(plus the extension allowed by SR 3.0.2)” in two places in the discussion for Example 1.4-3. According to this TSTF, the added phrase would clarify the applicability of the 25% allowance of SR 3.0.2 to time periods discussed in NOTES in the “SURVEILLANCE” column as well as to time periods in the “FREQUENCY” column.

These changes are included in WOG STS 1.4, Rev. 4 but not in AP1000 GTS 1.4, Rev. 19.

TSTF-485-A, Rev. 0 revised the text in Example 1.4-1 of the WOG STS 1.4, Rev. 3.1 to be consistent with the requirements of SR 3.0.4. The change is included in WOG STS 1.4, Rev. 4 and is also included in GTS 1.4, Rev. 19.

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 1.4, Frequency

Changes to the Generic Technical Specifications and Bases:

Insert the phrase “(plus the extension allowed by SR 3.0.2)” in two places in the discussion for Example 1.4-3. (TSTF-475-A, Rev. 1)

(See the details in the following section of this GTST “Traveler Information - Description of TSTF Changes” and in the markup version of this section).

VI. Traveler Information

Description of TSTF changes:

TSTF-475-A, Rev. 1 revised the text in Example 1.4-3 of the WOG STS 1.4, Rev. 3.1. This is accomplished by adding the phrase “*(plus the extension allowed by SR 3.0.2)*” in two places in the discussion for Example 1.4-3.

According to TSTF-475-A, Rev. 1, the revised last sentence in the second paragraph reads as follows:

“Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours *(plus the extension allowed by SR 3.0.2)* with power \geq 25% RTP.”

Also the revised second sentence in the last paragraph reads as follows:

“If the Surveillance were not performed within this 12 hour interval *(plus the extension allowed by SR 3.0.2)*, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.”

where the added phrase is shown above as underlined.

This added phrase is included in WOG STS 1.4, Rev. 4 but not in AP1000 GTS 1.4, Rev. 19. Based on this TSTF, this GTST will implement the above mentioned change in the AP1000 STS 1.4, Rev. 0.

TSTF-485-A, Rev. 0 revised the text in Example 1.4-1 of the WOG STS 1.4, Rev. 3.1 to be consistent with the requirements of SR 3.0.4. The text of the last paragraph is changed from:

“If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4.”

to the following text:

“If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. ~~The~~ Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the MODE or other specified condition. ~~Failure to do so would result in a violation of SR 3.0.4.~~ or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.”

The added text is shown underlined and the deleted text is crossed out. These changes are included in WOG STS 1.4, Rev. 4 and also in GTS 1.4. Therefore, this GTST will keep the text in AP1000 STS 1.4, Rev. 0 the same as in GTS 1.4.

Rationale for TSTF changes:

Based on TSTF-475-A, Rev. 1, the added phrase “*(plus the extension allowed by SR 3.0.2)*” in the two places mentioned before in Example 1.4-3 would make it clear that the 1.25 provision in SR 3.0.2 is equally applicable to time periods specified in the “FREQUENCY” column and in NOTES in the “SURVEILLANCE” column. More discussion of the technical aspects of this change is explained later by this GTST in Section “VII GTST Safety Evaluation - Technical Analysis.”

TSTF-485-A, Rev. 0 revised the text in Example 1.4-1 of the WOG STS 1.4, Rev. 3.1 to be consistent with the requirements of SR 3.0.4. According to this TSTF, SR 3.0.4 was revised by TSTF-359, Revision 9 and the text of the current example (Example 1.4-1 of the WOG STS 1.4, Rev. 3.1) is not consistent with the Technical Specification requirements. Therefore, the above mentioned changes in the text are made to be consistent with TSTF-359.

Details of the technical reasoning for the changes made are explained later by this GTST in Section “VII GTST Safety Evaluation - Technical Analysis.”

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

None

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

Not applicable

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

None

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

Not applicable

VII. GTST Safety Evaluation

Technical Analysis:

According to TSTF-475-A, Rev. 1, “the provisions of SR 3.0.2 (which permit a 25% grace period to facilitate surveillance scheduling and avoid plant operating conditions that may not be suitable for conducting the test) also apply to the time periods listed in Notes in the “SURVEILLANCE” column. This is because SR 3.0.2 states that “The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified...”

“Therefore, Example 1.4-3 is revised to be consistent with the above statements. The Example currently explicitly recognizes that the 25% extension allowed by SR 3.0.2 is applicable to the time period listed in the “FREQUENCY” column, but it does not explicitly recognize that the SR 3.0.2 extension is applicable to the time period listed in the NOTE in the “SURVEILLANCE” column. The change to the Example provides this explicit recognition by copying the phrase “(plus the extension allowed by SR 3.0.2)” in two additional portions of the discussion for this Example.”

TSTF-485-A, Rev. 0 indicates that the last paragraph for Example 1.4-1 of the WOG STS 1.4, Rev. 3.1 states that: “if the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, the Surveillance must be performed within the Frequency requirements of SR 3.0.2 prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4.”

TSTF-485-A, Rev. 0 continues, “SR 3.0.4 states that 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. TSTF-359 modified SR 3.0.4 to state that 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. TSTF-359 modified LCO 3.0.4 to provide conditions under which it is acceptable to enter the Applicability of the LCO with the LCO not met. Therefore, it is possible to enter the MODE or other specified condition in the Applicability of an LCO with a Surveillance not performed within the Frequency requirements of SR 3.0.2 and this does not result in a violation of SR 3.0.4.”

Therefore, “The Example 1.4-1, second paragraph discussion is modified to parallel the discussion in the previous paragraph. The previous paragraph discusses Surveillances that exceed the interval without being performed while in the Applicability. The second paragraph is modified to make a similar statement regarding Surveillances that exceed the interval while not being in the Applicability. “

Furthermore, according to TSTF-485-A, Rev. 0, “The second sentence of the second paragraph is modified to reference the provisions of SR 3.0.3. This is necessary as TSTF-359 modified SR 3.0.4 to recognize that performance of a missed Surveillance may have been extended and prior to performance of the missed Surveillance, but within the time permitted under SR 3.0.3, a MODE change occurs.”

“The statement indicates that failure to perform Surveillance prior to entering the Applicability would constitute a violation of SR 3.0.4 is deleted and a statement is inserted to state the LCO would not be met and LCO 3.0.4 becomes applicable. This is consistent with the revised SR 3.0.4.”

Having found that this GTST's proposed changes to the GTS are acceptable, the NRC staff concludes that AP1000 STS Subsection 1.4 is an acceptable model Specification for the AP1000 standard reactor design.

References to Previous NRC Safety Evaluation Reports (SERs):

None

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 5/20/2014.

None

NRC Final Approval Date: 12/15/2015

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

None

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. 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).
 6. 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).

7. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML 14265A493).
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XI. MARKUP of the Applicable GTS Subsection 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.

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE The purpose of this section is to define the proper use and application of Frequency requirements.

DESCRIPTION Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated LCO. An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.

The “specified Frequency” is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The “specified Frequency” consists of the requirements of the Frequency column of each SR as well as certain Notes in the Surveillance column that modify performance requirements.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are “otherwise stated” conditions allowed by SR 3.0.1. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillances, or both.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only “required” when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

The use of “met” or “performed” in these instances conveys specific meanings. A Surveillance is “met” only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being “performed,” constitutes a Surveillance not “met.” “Performance” refers only to the requirement to specifically determine the ability to meet the acceptance criteria.

1.4 Frequency

DESCRIPTION (continued)

Some Surveillances contain notes that modify the Frequency of performance or the conditions during which the acceptance criteria must be satisfied. For these Surveillances, the MODE entry restrictions of SR 3.0.4 may not apply. Such a Surveillance is not required to be performed prior to entering a MODE or other specified condition in the Applicability of the associated LCO if any of the following three conditions are satisfied:

- a. The Surveillance is not required to be met in the MODE or other specified condition to be entered; or
- b. The Surveillance is required to be met in the MODE or other specified condition to be entered, but has been performed within the specified Frequency (i.e., it is current) and is known not to be failed; or
- c. The Surveillance is required to be met, but not performed, in the MODE or other specified condition to be entered, and is known not to be failed.

Examples 1.4-3, 1.4-4, 1.4-5, and 1.4-6 discuss these special situations.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-1SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside the specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then SR 3.0.3 becomes applicable.

If the interval **as** specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. The Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the MODE or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-2SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours after ≥ 25% RTP <u>AND</u> 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector “AND” indicates that both Frequency requirements must be met. Each time the reactor power is increased from a power level < 25% RTP to ≥ 25% RTP, the Surveillance must be performed within 12 hours.

The use of “Once” indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by “AND”). This type of Frequency does not qualify for the 25% extension allowed by SR 3.0.2. “Thereafter” indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the “once” performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-3SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Not required to be performed until 12 hours after ≥ 25% RTP.</p> <p>-----</p> <p>Perform channel adjustment.</p>	<p style="text-align: center;">7 days</p>

The interval continues, whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the “specified Frequency.” Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be performed within the “specified Frequency.” Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours **(plus the extension allowed by SR 3.0.2)** with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval **(plus the extension allowed by SR 3.0.2)**, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-4SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p style="text-align: center;">Only required to be met in MODE 1.</p> <p style="text-align: center;">-----</p> <p>Verify leakage rates are within limits.</p>	24 hours

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an “otherwise stated” exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-5SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Only required to be performed in MODE 1.</p> <p>-----</p> <p>Perform complete cycle of the valve.</p>	<p>7 days</p>

The interval continues, whether or not the unit operation is in MODE 1, 2, or 3 (the assumed Applicability of the associated LCO) between performances.

As the Note modifies the required performance of the Surveillance, the Note is construed to be part of the “specified Frequency.” Should the 7 day interval be exceeded while operation is not in MODE 1, this Note allows entry into and operation in MODES 2 and 3 to perform the Surveillance. The Surveillance is still considered to be performed within the “specified Frequency” if completed prior to entering MODE 1. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was not in MODE 1, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not result in entry into MODE 1.

Once the unit reaches MODE 1, the requirement for the Surveillance to be performed within its specified Frequency applies and would require that the Surveillance had been performed. If the Surveillance were not performed prior to entering MODE 1, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-6SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p style="text-align: center;">Not required to be met in MODE 3.</p> <p style="text-align: center;">-----</p> <p>Verify parameter is within limits.</p>	24 hours

Example 1.4-6 specifies that the requirements of this Surveillance do not have to be met while the unit is in MODE 3 (the assumed Applicability of the associated LCO is MODES 1, 2, and 3). The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an “otherwise stated” exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), and the unit was in MODE 3, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES to enter MODE 3, even with the 24 hour Frequency exceeded, provided the MODE change does not result in entry into MODE 2. Prior to entering MODE 2 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

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.

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE	The purpose of this section is to define the proper use and application of Frequency requirements.
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DESCRIPTION	Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated LCO. An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.
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The “specified Frequency” is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The “specified Frequency” consists of the requirements of the Frequency column of each SR as well as certain Notes in the Surveillance column that modify performance requirements.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are “otherwise stated” conditions allowed by SR 3.0.1. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillances, or both.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only “required” when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

The use of “met” or “performed” in these instances conveys specific meanings. A Surveillance is “met” only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being “performed,” constitutes a Surveillance not “met.” “Performance” refers only to the requirement to specifically determine the ability to meet the acceptance criteria.

1.4 Frequency

DESCRIPTION (continued)

Some Surveillances contain notes that modify the Frequency of performance or the conditions during which the acceptance criteria must be satisfied. For these Surveillances, the MODE entry restrictions of SR 3.0.4 may not apply. Such a Surveillance is not required to be performed prior to entering a MODE or other specified condition in the Applicability of the associated LCO if any of the following three conditions are satisfied:

- a. The Surveillance is not required to be met in the MODE or other specified condition to be entered; or
- b. The Surveillance is required to be met in the MODE or other specified condition to be entered, but has been performed within the specified Frequency (i.e., it is current) and is known not to be failed; or
- c. The Surveillance is required to be met, but not performed, in the MODE or other specified condition to be entered, and is known not to be failed.

Examples 1.4-3, 1.4-4, 1.4-5, and 1.4-6 discuss these special situations.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-1SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside the specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, then SR 3.0.4 becomes applicable. The Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the MODE or other specified condition or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-2SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours after ≥ 25% RTP <u>AND</u> 24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time the reactor power is increased from a power level < 25% RTP to ≥ 25% RTP, the Surveillance must be performed within 12 hours.

The use of "Once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the 25% extension allowed by SR 3.0.2. "Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-3SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Not required to be performed until 12 hours after ≥ 25% RTP.</p> <p>-----</p> <p>Perform channel adjustment.</p>	<p style="text-align: center;">7 days</p>

The interval continues, whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required performance of the Surveillance, it is construed to be part of the “specified Frequency.” Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be performed within the “specified Frequency.” Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours (plus the extension allowed by SR 3.0.2) with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval (plus the extension allowed by SR 3.0.2), there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-4SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p style="text-align: center;">Only required to be met in MODE 1.</p> <p style="text-align: center;">-----</p> <p>Verify leakage rates are within limits.</p>	24 hours

Example 1.4-4 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an “otherwise stated” exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the unit was not in MODE 1, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-5SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Only required to be performed in MODE 1.</p> <p>-----</p> <p>Perform complete cycle of the valve.</p>	<p style="text-align: center;">7 days</p>

The interval continues, whether or not the unit operation is in MODE 1, 2, or 3 (the assumed Applicability of the associated LCO) between performances.

As the Note modifies the required performance of the Surveillance, the Note is construed to be part of the “specified Frequency.” Should the 7 day interval be exceeded while operation is not in MODE 1, this Note allows entry into and operation in MODES 2 and 3 to perform the Surveillance. The Surveillance is still considered to be performed within the “specified Frequency” if completed prior to entering MODE 1. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was not in MODE 1, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not result in entry into MODE 1.

Once the unit reaches MODE 1, the requirement for the Surveillance to be performed within its specified Frequency applies and would require that the Surveillance had been performed. If the Surveillance were not performed prior to entering MODE 1, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-6SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p style="text-align: center;">-----NOTE-----</p> <p>Not required to be met in MODE 3.</p> <p>-----</p> <p>Verify parameter is within limits.</p>	<p style="text-align: center;">24 hours</p>

Example 1.4-6 specifies that the requirements of this Surveillance do not have to be met while the unit is in MODE 3 (the assumed Applicability of the associated LCO is MODES 1, 2, and 3). The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an “otherwise stated” exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), and the unit was in MODE 3, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES to enter MODE 3, even with the 24 hour Frequency exceeded, provided the MODE change does not result in entry into MODE 2. Prior to entering MODE 2 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.