

## Definition of “Operational Convenience”

### Problem Statement

The term "operational convenience" appears frequently in inspection reports and findings in contexts that do not appear to be consistent with the original intent of the term or the Technical Specifications (TS) Bases. This results in licensees with no clear guidance on what is, and isn't, considered inappropriate entry into a TS action for operational convenience.

### Background

Following approval of TSTF-529, "Clarify Use and Application Rules," the term “operational convenience” appears twice in the Bases of each ISTS NUREG. It does not appear in the Specifications.

The LCO 3.0.2 Bases state:

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety. Intentional entry into ACTIONS should not be made for operational convenience. Additionally, if intentional entry into ACTIONS would result in redundant equipment being inoperable, alternatives should be used instead. Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered. Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

The LCO 3.0.3 Bases state:

This Specification delineates the time limits for placing the unit in a safe MODE or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its ACTIONS. It is not intended to be used as an operational convenience that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

The term “operational convenience” first appears in the model Technical Specifications in Generic Letter (GL) 87-09, “Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements.” The Model BWR Technical Specifications 3.0 Bases (GL 87-09, Enclosure 5) only mentioned “operational convenience” in LCO 3.0.3 Bases. However, the PWR 3.0 Bases, GL 87-09 Enclosure 3, included the “operational convenience” limitation in the LCO 3.0.1 Bases. In both cases, the term “operational convenience” was equated with “routine voluntary removal of

redundant system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.” Also, in both the PWR LCO 3.0.1 Bases and the PWR and BWR LCO 3.0.3 Bases, the discussion of “operational convenience” was in the context of Actions requiring a shutdown.

During the development of LCO 3.0.2 Bases in Revision 0 of the ISTS NUREGs, the phrase “operational convenience” was separated from the description “routine voluntary removal of redundant system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.” The GL 87-09 intent was retained in the ISTS LCO 3.0.3 Bases.

### Review of Inspection Reports

A review of recent inspection reports identified several instances in which the term "operational convenience" was cited in circumstances in which redundant systems or components were not routinely made inoperable, or when the TS Bases were used as requirements. This ambiguity results in many questions from licensees and licensed operators.

### Analysis

The Bases state, "The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems." However, this list is sometimes treated as exclusive and other reasons for entering Actions as being inappropriate. That is not consistent with the Bases and applies a restriction not consistent with LCO 3.0.2.

In some of these examples, the LCO 3.0.2 Bases statement, "Entering ACTIONS for these reasons must be done in a manner that does not compromise safety," is merged with the discussion of operational convenience. Operational convenience has a very specific intent under GL 87-09, while the concept of "in a manner that doesn't compromise safety" is not well defined. Merging these concepts results in licensees being unsure on what is considered inappropriate operational convenience.

### Recommendation

The Bases should be modified to be consistent with the intent of the phrase “operational convenience” as originally presented in Generic Letter 87-09. The LCO 3.0.2 Bases should be modified to state:

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. ~~The reasons for intentionally relying on the ACTIONS include, but are not limited to, performance of Surveillances, preventive maintenance, corrective maintenance, or investigation of operational problems. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety.~~ Intentional entry into ACTIONS should not be made for operational convenience *that permits routine voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.* ~~Additionally, if intentional entry into ACTIONS would~~

~~result in redundant equipment being inoperable, alternatives should be used instead.~~

Doing so limits the time both subsystems/divisions of a safety function are inoperable and limits the time conditions exist which may result in LCO 3.0.3 being entered.

Individual Specifications may specify a time limit for performing an SR when equipment is removed from service or bypassed for testing. In this case, the Completion Times of the Required Actions are applicable when this time limit expires, if the equipment remains removed from service or bypassed.

This change would make the LCO 3.0.2 and LCO 3.0.3 Bases discussion of operational convenience consistent, and consistent with the intent stated GL 87-09. The partial list of reasons that Actions may be entered voluntarily is proposed to be deleted as it adds no value and can result in misunderstanding of LCO 3.0.2.

If the NRC desires to discuss in the LCO 3.0.2 Bases the concept that Actions should only be entered intentionally in a manner that does not compromise safety, the TSTF would be interested in working with the staff to develop a description that is specific and can be understood and applied by licensees.