

May 9, 2017

TSTF-17-06
PROJ0753

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

SUBJECT: Request to Incorporate TSTF-565, "Clarify the Term Operational Convenience in the LCO 3.0.2 Bases," into the Standard Technical Specifications

The TSTF requests that the NRC incorporate the attached traveler, TSTF-565, "Clarify the Term Operational Convenience in the LCO 3.0.2 Bases," into the Standard Technical Specifications (STS) for Babcock & Wilcox, Westinghouse, Combustion Engineering, General Electric Boiling Water Reactor (BWR)/4 and BWR/6, and Westinghouse AP1000® plants (NUREG-1430, -1431, -1432, -1433, -1434, and 2194).

TSTF-565 revises the Technical Specifications Bases use of the term "operational convenience" in Limiting Condition for Operation (LCO) 3.0.2 to correct an inconsistency between the LCO 3.0.2 and LCO 3.0.3 Bases, and to restore the original intent of the phrase described in Generic Letter 87-09.

The traveler makes no change to the Technical Specifications and is consistent with LCO 3.0.2. Licensees may adopt this traveler using the Technical Specifications Bases Control Program. In order to maintain consistency between the NRC's guidance documents and plant-specific Technical Specifications, we recommend that the change also be made to STS.

We request that the NRC review the traveler for incorporation into the next revision of the STS. The cost of the review may be billed to the Pressurized Water Reactor Owners Group and the Boiling Water Reactor Owner's Group.

Should you have any questions, please do not hesitate to contact us.



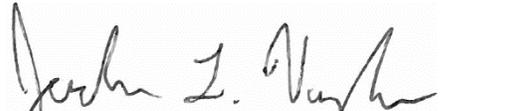
James R. Morris (PWROG/W)



Lisa L. Williams (BWROG)



Otto W. Gustafson (PWROG/CE)



Jordan L. Vaughan (PWROG/B&W)



Jason P. Redd (APOG)

cc: Michelle Honcharik, Technical Specifications Branch
Jennifer Whitman, Technical Specifications Branch

Technical Specifications Task Force Improved Standard Technical Specifications Change Traveler

Clarify the Term Operational Convenience in the LCO 3.0.2 Bases

NUREGs Affected: 1430 1431 1432 1433 1434 2194

Classification: 2) Bases Only Change

Recommended for CLIP?: No

Correction or Improvement: Improvement

NRC Fee Status: Not Exempt

Changes Marked on ISTS Rev 4.0

See attached justification.

Revision History

OG Revision 0

Revision Status: Active

Revision Proposed by: TSTF

Revision Description:
Original Issue

Owners Group Review Information

Date Originated by OG: 10-Jan-17

Owners Group Comments
(No Comments)

Owners Group Resolution: Approved Date: 02-Feb-17

TSTF Review Information

TSTF Received Date: 01-Feb-17

Date Distributed for Review 21-Feb-17

TSTF Comments:
(No Comments)

TSTF Resolution: Approved

Date: 09-May-17

NRC Review Information

NRC Received Date: 09-May-17

Affected Technical Specifications

LCO 3.0.2 Bases

Use and Application

09-May-17

1 SUMMARY DESCRIPTION

The proposed change revises the Limiting Condition for Operation (LCO) 3.0.2 Bases use of the term "operational convenience" to clarify an inconsistency between the LCO 3.0.2 and LCO 3.0.3 Bases and the original intent of the phrase.

2 DETAILED DESCRIPTION

2.1 Background

The term "operational convenience" was not used in the Standard Technical Specifications (STS) NUREG-0103 (Babcock & Wilcox (B&W) plants), NUREG-0123 (Boiling Water Reactor (BWR) plants), NUREG-0212 (Combustion Engineering plants), or NUREG-0452 (Westinghouse plants), which were issued between 1976 through 1981.

The first use of the term "operational convenience" with regard to TS Actions was 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," dated June 4, 1987 (Reference 1). The GL was part of the Technical Specifications (TS) improvement program that lead to the issuance of the Improved Standard Technical Specifications (ISTS). GL 87-09 included short-term TS improvements to resolve immediate concerns that had been identified in investigations of TS problems by both NRC and the industry. Adoption of the TS and TS Bases changes in GL 87-09 was not mandatory.

Prior to GL 87-09, the 1982 issuance of the Virgil Summer Nuclear Station TS and the 1986 reissuance of the Oyster Creek Unit 1 TS used the term "operational convenience" in the TS Bases discussion of TS 4.0.3 (equivalent to the STS Surveillance Requirement 3.0.3). A statement was made similar to "Use of the delay period established by SR 4.0.3 is a flexibility, which is not intended to be used as an operational convenience to extend surveillance intervals."

Enclosure 3 to of GL 87-09 provided revised Bases for pressurized water reactors (PWRs). The recommended Bases for Specification 3.0.1 stated:

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in a MODE or condition in which the specification no longer applies. It is not intended that the shutdown ACTION requirements be used as an operational convenience which permits (routine) voluntary removal of redundant a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. (emphasis added)

The recommended Bases for Specification 3.0.3 stated:

Specification 3.0.3 establishes the shutdown ACTION requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated ACTION requirements. The purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown MODE when plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its ACTION requirements. It is not intended to be used as an operational convenience which 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. (emphasis added).

Enclosure 5 to GL 87-09 provided revised Bases for BWRs. The recommended Bases for Specification 3.0.1 were slightly different than the PWR Bases, and stated:

The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met. It is not intended that the shutdown ACTION requirements be used as an operational convenience which permits (routine) voluntary removal of a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

The Enclosure 5 recommended BWR Bases for Specification 3.0.3 were the same as the PWR recommended Bases.

There is no discussion in GL 87-09 regarding the addition of the term "operational convenience" to the Bases.

The Boiling Water Reactor Owners' Group, Westinghouse Owners Group, and B&W Owners Group proposed Standard Technical Specifications (References 2, 3, and 4). The LCO 3.0 Bases included discussions of operational convenience consistent with the wording in GL 87-09. The Combustion Engineering Owners Group proposed Standard Technical Specifications Bases did not discuss operational convenience.

During the development of LCO 3.0.2 Bases in the draft 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 NRC's January 1991 "Draft Report for Comment," LCO 3.0.2 Bases, stated:

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. It is not intended that intentional entry into ACTIONS be made for operational convenience. Intentional entry into ACTIONS Conditions with shutdown Required Actions (i.e., Actions requiring a change in MODE) is strongly discouraged and should be considered only in extreme circumstances. This is

to limit routine voluntary removal of redundant equipment from service in lieu of other alternatives that would not result in redundant equipment being inoperable.

The draft LCO 3.0.3 Bases retained the GL 87-09 wording.

In the time that the ISTS NUREGs were being prepared, the NRC staff was concerned with licensees performing maintenance during plant operation. This concern is the likely reason the of GL 87-09 Bases were expanded to discuss intentionally relying on Actions and not compromising safety. For example, in a letter from the NRC to the Institute of Nuclear Power Operations dated December 27, 1990 (Reference 5), the NRC stated,

The NRC staff has noticed an increased tendency to perform preventive maintenance during power operation. This includes maintenance of equipment required to be operable by technical specifications. In order to perform this maintenance, utilities enter action statements of the Limiting Conditions for Operation (LCOs) in their technical specifications.

[O]n-line maintenance primarily for the purpose of limiting plant outage time or other operational convenience, should not be undertaken without a full appreciation of the effects of this practice on plant safety.

The industry provided extensive comments on the 1991 "Draft Report for Comment," including the proposed LCO 3.0.2 Bases. The June 1992 "Proof and Review" version of the ISTS NUREGs revised the LCO 3.0.2 Bases to address the comments. The "Proof and Review" LCO 3.0.3 Bases retained the GL 87-09 wording.

The published versions of the ISTS NUREGs (September 1992) contained the same LCO 3.0.2 and LCO 3.0.3 Bases discussion of operational convenience as the "Proof and Review" versions. These Bases discussions are unchanged through Revision 4 of the ISTS NUREGs.

2.2 Current Technical Specifications Bases

The ISTS 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. (emphasis added)

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. (emphasis added)

TSTF-529-A, Revision 4, "Clarify Use and Application Rules," approved by the NRC on April 21, 2016, eliminated references to "operational convenience," from the SR 3.0.2 and SR 3.0.3 Bases.

2.3 Reason for the Proposed Change

The current LCO 3.0.2 Bases discussion of "operational convenience" is not consistent with the original intent in GL 87-09 or the use of the term in the LCO 3.0.3 Bases. The use of the term "Additionally" in the LCO 3.0.2 Bases implies that operational convenience is not limited to rendering redundant equipment inoperable, without providing any guidance as to its meaning. The original concept of avoiding the use of action requirements for routine, voluntary removal of redundant systems or components from service when there are other alternatives is lost in the current LCO 3.0.2 Bases.

A review of recent inspection reports identified several instances in which the term "operational convenience" was cited in circumstances not associated with redundant systems or components being routinely made inoperable. Of equal concern, in some inspection reports the TS Bases were cited as regulatory requirements even though 10 CFR 50.36 states that the Bases are not part of the TS. The ambiguity of the LCO 3.0.2 Bases, the inconsistency with the LCO 3.0.3 Bases, and the varying use of the term in NRC actions has resulted in confusion and questions from licensees and licensed operators, prompting the proposed revision.

2.4 Description of the Proposed Change

The LCO 3.0.2 Bases are proposed to be revised to state (removed words are struck out, added words are in italics):

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.

The proposed change is a change to the TS Bases. The TSTF is requesting that the NRC review and approve the proposal as a change to the Standard Technical Specifications (NUREG-1430 through 1434, and NUREG-2194).

Licensees may make the change to the TS Bases in accordance with the Technical Specifications Bases Control Program without prior NRC approval. Therefore, no model application is included in the traveler.

3 TECHNICAL EVALUATION

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 in GL 87-09.

Operational Convenience

The existing LCO 3.0.2 Bases state, "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." The proposed change revises the LCO 3.0.2 Bases to replace these two sentences with the following, "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."

A search of the NRC docket in the time period of GL 87-09 finds the term "operational convenience" used in its usual, English meaning, such as "The flush ports are provided as an operational convenience to flush the exhaust line out of any corrosion products," or "For operational convenience, 40% of rated power has been chosen as the setpoint below which these trips are bypassed. This setpoint is coincident with bypass valve capacity." Therefore, simply stating that Actions should not be intentionally entered for operational convenience is inaccurate and incomplete. Actions are frequently entered for the convenience of performing required Surveillances online instead of shutting down the plant to perform the test. This is an "operational convenience" but is not prohibited by the TS. The concept in GL 87-09 is redundant components should not be routinely removed from service when there are other alternatives. This position is lost in the current LCO 3.0.2 Bases.

The existing LCO 3.0.2 Bases states that alternatives should always be used instead of removing redundant equipment from service. The GL 87-09 Bases stated that redundant equipment should not be routinely removed from service if there are other alternatives. When Generic Letter 87-09 was written, the NRC recognized that there may be conditions under which voluntary removal of redundant components may be required. In a 1987 memorandum from the NRC Region V Administrator to the NRC Director of the Office of Nuclear Reactor Regulation, (Reference 6), the Administrator stated:

[As a result of the review of a recent event], Region V has concluded that it may be beneficial for the NRC to reiterate to both the NRC staff and power reactor licensees, the intent of LCO 3.0.3 and our expectations concerning licensee management control of entry into LCO 3.0.3. ... Region V recognizes that occasional entry into LCO 3.0.3 for surveillance or maintenance purposes may be appropriate, however, this activity should be well thought-out in advance and strictly controlled by management oversight and appropriate procedures.

Note that this memorandum was written in March 1987 and GL 87-09 was published in June 1987.

The proposed change to the LCO 3.0.2 Bases captures important concepts that are not clear or not stated in the current Bases:

- The term "operational convenience" is equated with the routine, voluntary removal of redundant equipment from service.
- Licensees should not remove redundant equipment from service when there are other alternatives that would not result in removing redundant equipment from service.

Reasons for Intentionally Entering Actions

The LCO 3.0.2 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. Entering ACTIONS for these reasons must be done in a manner that does not compromise safety."

LCO 3.0.2 states, "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." The TS do not limit entering Actions to specific intentional or unintentional purposes. 10 CFR 50.36(a) states, "A summary statement of the bases or reasons for such specifications, other than those covering administrative controls, shall also be included in the application, but shall not become part of the technical specifications." In other words, the Bases are not part of the TS and cannot change the TS. Therefore, Bases statements should not imply limitations beyond the wording in the TS, as does the existing LCO 3.0.2 Bases.

The existing Bases statement has been misconstrued as a regulatory requirement. A review of inspection reports discovered three instances since 2011 in which findings referenced these statements as a requirement that was not followed by a licensee (Reference 7, 8, and 9).

10 CFR 50.65 (the Maintenance Rule), paragraph (a)(4), requires licensees to assess and manage any increase in risk that may result from maintenance activities, such as performance of surveillances, post-maintenance testing, and corrective and preventive maintenance. This regulation requires that intentional removal of equipment from service is not done in a manner that compromises safety. The actions to implement this regulation would identify unacceptable increases in plant risk from intentionally removing redundant equipment from service and would prompt identification of an alternative. Actions are entered when TS required equipment is inoperable or otherwise removed from service, and the Maintenance Rule requires risk to be

assessed and managed. Therefore, the existing LCO 3.0.2 Bases statement that Actions must be done in a manner that does not compromise safety is redundant and unnecessary.

As these Bases statements are not consistent with the TS, add no value, and have been misconstrued, they are proposed to be eliminated.

4 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

10 CFR 50.36 "Technical Specifications," paragraph (a) states that the TS are to include summary statement of the bases or reasons for such specifications, other than those covering administrative controls, but these bases shall not become part of the technical specifications. A licensee may make changes to the TS Bases without prior NRC staff review and approval in accordance with the Technical Specifications Bases Control Program. The proposed Bases change revises the Bases to provide a more accurate description of the reasons for the associated TS (LCO 3.0.2) and, therefore, is compliant with the regulation.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5 REFERENCES

1. U.S. NRC Generic Letter 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," dated June 4, 1987.
2. BWR Owners' Group to U.S. NRC, "BWR Owners' Group (BWROG) Improved BWR Technical Specifications," dated May 5, 1989.
3. Westinghouse Owners Group to U.S. NRC, "Westinghouse Owners Group MERITS Program Phase II, Technical Specifications and Bases," dated March 30, 1989.
4. The B&W Owners Group to the US. NRC, "B&W Owners Group Revised Standard Technical Specifications," dated May 1, 1989.
5. Letter from James H. Sniezek (NRC) to Kenneth Strahm (INPO), dated December 27, 1990.
6. Letter from J. B. Martin, Regional Administrator, Region V, to Harold R. Denton, Director, Office of Nuclear Reactor Regulation, "Intentional Entry into Technical Specification Limiting Condition for Operation 3.0.3," dated March 18, 1987.
7. Letter from James Cameron (NRC) to Mark Bezilla (FirstEnergy), "Perry Nuclear Power Plant NRC integrated Inspection Report 05000440/2011003," dated July 28, 2011.

8. Letter from Randall Musser (NRC) to Randy Gideon (Carolina power and Light Company), "H. B. Robinson Steam Electric Plant - NRC Integrated Inspection Report 05000261/2012002," dated April 30, 2012.
9. Letter from John Ellegood (NRC) to Bryan Hanson (Exelon Nuclear), "Re-Issued Inspection Report: Byron Station, Units 1 AND 2, NRC Integrated Inspection Report 05000454/2014005; 05000455/2014005," dated February 10, 2015.

Enclosure 1

Technical Specifications Bases Proposed Changes

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

The Completion Times of the Required Actions are also applicable when a system or component is removed from service intentionally. ~~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/trains 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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and either:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

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/trains 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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

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/trains 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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and either:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.10, "RCS Pressure and Temperature (P/T) Limits."

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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such

BASES

LCO 3.0.2 (continued)

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.11, "RCS Pressure and Temperature (P/T) Limits."

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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.

LCO 3.0.3

LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and:

- a. An associated Required Action and Completion Time is not met and no other Condition applies or
- b. The condition of the unit is not specifically addressed by the associated ACTIONS. This means that no combination of Conditions stated in the ACTIONS can be made that exactly corresponds to the actual condition of the unit. Sometimes, possible combinations of Conditions are such that entering LCO 3.0.3 is warranted; in such

BASES

LCO 3.0.2 (continued)

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

The nature of some Required Actions of some Conditions necessitates that, once the Condition is entered, the Required Actions must be completed even though the associated Conditions no longer exist. The individual LCO's ACTIONS specify the Required Actions where this is the case. An example of this is in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits."

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/trains 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.

When a change in MODE or other specified condition is required to comply with Required Actions, the unit may enter a MODE or other specified condition in which another Specification becomes applicable. In this case, the Completion Times of the associated Required Actions would apply from the point in time that the new Specification becomes applicable, and the ACTIONS Condition(s) are entered.