



June 29, 2017

L-2017-091

10 CFR 50.90

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

Re: Turkey Point Nuclear Plant, Units 3 and 4  
Docket Nos. 50-250 and 50-251

License Amendment Request 252, Application for Technical Specifications Change Regarding Mode Change Limitations Using the Consolidated Line Item Improvement Process.

In accordance with the provisions of 10 CFR 50.90, Florida Power & Light Company (FPL) is submitting License Amendment Request 252 for an amendment to the technical specifications (TS) for Turkey Point Units 3 and 4. The proposed amendment would modify TS requirements for mode change limitations in TS 3.0.4 and 4.0.4. The proposed changes are consistent with NRC approved TSTF-359, "Increase Flexibility in Mode Restraints," Revision 9, which is the equivalent of TSTF-359, Revision 8, as modified by the notice in the Federal Register published April 4, 2003.

Attachment 1 provides a description of the proposed change (including a table of affected TS with a brief descriptor of the change), the requested confirmation of applicability, and plant specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides the existing TS Bases pages marked up to show the proposed change. Attachment 4 provides the regulatory commitment made in this submittal. The retyped TS pages will be provided later upon request from the NRC project manager.

FPL requests approval of the proposed amendment by July 1, 2018, with implementation of the amendment within 90 days following issuance.

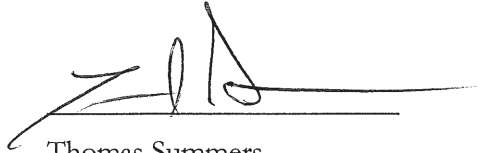
The Turkey Point Onsite Review Group has reviewed the proposed license amendment. In accordance with 10 CFR 50.91(b)(1), a copy of this letter is being forwarded to the designee of the State of Florida.

Should you have any questions regarding this submittal, please contact Mr. Mitch Guth, Licensing Manager, at (305) 246-6698.

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

Executed on June 29, 2017

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Summers', is written over a horizontal line.

Thomas Summers  
Regional Vice President - Southern Region  
Florida Power & Light Company

Attachments

1. Description and Assessment of the Proposed Change
2. Markup of the Technical Specifications
3. Markup of the Technical Specifications Bases
4. Regulatory Commitment

cc: USNRC Regional Administrator, Region II  
USNRC Project Manager, Turkey Point Nuclear Plant  
USNRC Senior Resident Inspector, Turkey Point Nuclear Plant  
Ms. Cindy Becker, Florida Department of Health

## **ATTACHMENT 1**

### **Description and Assessment of the Proposed Change**

#### **1.0 DESCRIPTION**

The proposed amendment would modify technical specifications (TS) requirements for mode change limitations in limiting condition for operation (LCO) 3.0.4 and surveillance requirement (SR) 4.0.4. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-359 Revision 8, as modified by the notice in the *Federal Register* published on April 4, 2003. That *Federal Register* notice announced the availability of this TS improvement through the consolidated line item improvement process (CLIIP). (TSTF- 359, Revision 9 is the equivalent of TSTF-359, Revision 8, as modified by the notice in the Federal Register published April 4, 2003.)

TSTF-359 requires that plants adopting this change have a TS bases control program and the equivalent of STS surveillance requirement (SR) 3.0.1 and its associated bases. The Turkey Point TS include a TS bases control program and SR 4.0.1, which is equivalent to STS SR 3.0.1. The Turkey Point bases for SR 4.0.1 are similar to, but not as complete as the bases for STS SR 3.0.1, so changes to the bases for SR 4.0.1 are included with this amendment request.

The table at the end of this attachment lists the affected TS and bases and provides a brief description of the changes.

#### **2.0 ASSESSMENT**

##### **2.1 Applicability of Published Safety Evaluation**

Florida Power & Light Company (FPL) has reviewed the safety evaluation dated April 4, 2003 as part of the CLIIP. This review included a review of the NRC staff's evaluation, as well as the supporting information provided to support TSTF-359 Revision 8. FPL has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Turkey Point Units 3 and 4 and justify this amendment for the incorporation of the changes to the Turkey Point TS.

##### **2.2 Optional Changes and Variations**

FPL is proposing the following variations from the TS changes described in the modified TSTF-359 Revision 8 and the NRC staff's model safety evaluation dated April 4, 2003.

- a. The Turkey Point TS utilize different numbering and titles than NUREG-1431, Standard Technical Specifications for Westinghouse Plants, on which TSTF-359 was based. Additionally, the Turkey Point TS do not contain all of the TS that were revised by TSTF-359. These differences are administrative and do not affect the applicability of TSTF-359 to the Turkey Point TS.
- b. Turkey Point has not converted to the STS (NUREG 1431). As a result, the Turkey Point individual SRs do not stipulate the specific time frames and conditions necessary for meeting the SRs to allow entry into the mode or condition of applicability without having performed the SR. Consequently, the existing exceptions to SR 4.0.4 will be retained in the Turkey Point TS, and the proposed Bases for SR 4.0.4 will not include the paragraph below that is included in TSTF-359 for the Bases of SR 3.0.4.

*The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO's Applicability, would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note, as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.*

- c. TSTF-359 excludes the application of LCO 3.0.4.b to certain risk significant systems and components. For Westinghouse plants, TSTF-359 excludes the use of LCO 3.0.4.b for auxiliary feedwater (AFW) when entering Mode 1.

The Turkey Point AFW system includes three steam turbine-driven pumps such that each pump supplies feedwater to either Unit 3 or 4, with any single pump supplying the total feedwater requirement of either unit. Two pumps are normally aligned to one AFW train, and the third pump is normally aligned to the other AFW train.

TS 3.7.1.2, Auxiliary Feedwater, requires that two independent auxiliary feedwater trains including 3 steam supply flow paths, 3 pumps, and associated discharge water flow paths shall be operable. The LCO requires a third steam supply flow path aligned to one of the AFW trains and a third AFW pump that can be aligned to either train to restore operability in the event a train-associated AFW pump becomes inoperable. TS Action 1 provides a 72-hour allowed outage time (AOT) with one AFW train inoperable, and Action 2 provides a two-hour AOT with both trains

inoperable. For the condition that a single AFW pump is inoperable, TS Action 3 provides a 30-day AOT provided two independent AFW trains remain operable. Similarly, TS Action 4 provides a seven-day AOT for an inoperable steam supply flow path provided two independent steam supply flow paths remain operable. The current TS excludes the provisions of TS 3.0.4 for a single inoperable AFW pump.

The qualitative risk assessment for Westinghouse plants in TSTF-359 discusses the requirement for AFW when entering Mode 1. The key activities in Mode 1 involve increasing the reactor power level to 100%, transferring from AFW or startup feedwater to main feedwater, and bringing the turbine on-line. These startup activities provide for an increased probability of loss of feedwater flow to the steam generators. During this phase of the startup, the plant is more dependent on AFW than when operating at steady-state conditions due to the increased potential for loss of feedwater or turbine trip. A degraded AFW system puts the plant into a more susceptible condition with regard to decay heat removal.

FPL proposes to modify the LCO 3.0.4.b exclusion for AFW in TSTF-359 from *LCO 3.0.4.b not applicable when entering MODE 1* to *LCO 3.0.4.b is not applicable to the required auxiliary feedwater trains when entering MODE 1*. The note will prohibit a transition to Mode 1 with less than two independent AFW trains operable. On the other hand, the change will permit a transition to Mode 1 in accordance with LCO 3.0.4.b with a single AFW pump or steam supply flow path inoperable provided two independent AFW trains are operable.

A plant startup and the accompanying increased potential for loss of feedwater or turbine trip would likely involve only a single unit. In addition, two non-safety grade standby steam generator feedwater pumps (SSGFP) are provided. The SSGFPs are normally used to supply feedwater during start-up, shutdown, and hot standby conditions. One pump is motor driven and the other pump is diesel engine driven. While the AFW system is the normal supply of feedwater in the event of a loss of offsite power, feedwater can also be supplied by the diesel engine driven SSGFP. Therefore, FPL concludes that prohibiting Mode 1 entry without two operable AFW trains (although the mode change may proceed with a single AFW pump or steam supply inoperable) is appropriate while entry into Mode 1 with two operable trains provides sufficient AFW capability to mitigate a loss of feedwater during startup activities in Mode 1.

- d. TSTF-359 and the model safety evaluation refer to Regulatory Guide (RG) 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." However, RG 1.182 was withdrawn in November 2012 because it was redundant to the inclusion of its information in RG 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power

Plants.” Therefore, the proposed bases for Turkey Point LCO 3.0.4 refer to RG 1.160 rather than RG 1.182. This is an administrative variation that does not affect the applicability of TSTF-359 to the Turkey Point TS.

### 3.0 **REGULATORY ANALYSIS**

#### 3.1 **No Significant Hazards Consideration Determination**

The proposed amendment would modify technical specifications (TS) requirements for mode change limitations in limiting condition for operation (LCO) 3.0.4 and surveillance requirement (SR) 4.0.4. The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry Technical Specification Task Force (TSTF) Standard Technical Specifications (STS) change TSTF-359, Revision 8, as modified by the notice in the *Federal Register* published on April 4, 2003.

In accordance with 10 CFR 50.92, Florida Power & Light Company (FPL) has concluded that the proposed changes do not involve a significant hazards consideration (SHC). The basis for the conclusion that the proposed change does not involve a SHC is as follows:

1. *Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?*

Response: No

The proposed change allows entry into a mode or other specified condition in the applicability of a TS, while in a TS Action. Being in a TS Action is not an initiator of any accident previously evaluated. Therefore, the probability of an accident previously evaluated is not significantly increased. The consequences of an accident while relying on Actions as allowed by the proposed LCO 3.0.4 are no different than the consequences of an accident while relying on Actions for other reasons, such as equipment inoperability. Therefore, the consequences of an accident previously evaluated are not significantly affected by this change. The addition of a requirement to assess and manage the risk introduced by this change will further minimize possible concerns. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?*

Response: No.

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed). Entering into a mode

or other specified condition in the applicability of a TS while in a TS Action, will not introduce new failure modes or effects and will not, in the absence of other unrelated failures, lead to an accident whose consequences exceed the consequences of accidents previously evaluated. The addition of a requirement to assess and manage the risk introduced by this change will further minimize possible concerns. Thus, this change does not create the possibility of a new or different kind of accident from an accident previously evaluated.

3. *Does the proposed amendment involve a significant reduction in a margin of safety?*

Response: No.

The proposed change allows entry into a mode or other specified condition in the applicability of a TS while in a TS Action. The TS allow operation of the plant without the full complement of equipment through the Actions for not meeting the TS Limiting Conditions for Operation (LCO). The risk associated with this allowance is managed by the imposition of Actions that must be performed within the prescribed completion times. The net effect of being in a TS Action on the margin of safety is not considered significant. The proposed change does not alter the required actions or completion times of the TS. The proposed change allows TS Actions to be entered and the associated required actions and completion times to be used in new circumstances. This use is predicated upon performance of a risk assessment and the management of plant risk. The change also eliminates current allowances for utilizing Actions in similar circumstances without assessing and managing risk. The net change to the margin of safety is insignificant. Therefore, this change does not involve a significant reduction in a margin of safety.

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.

### 3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on April 4, 2003 for this TS improvement, plant-specific verifications were performed as follows:

1. FPL has established TS Bases for LCO 3.0.4 and SR 4.0.4, which state that use of the TS mode change limitation flexibility established by LCO 3.0.4 and SR

4.0.4 is not to be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to operable status before entering an associated mode or other specified condition in the TS Applicability.

2. The modification also includes changes to the bases for LCO 3.0.4 and SR 4.0.4 that provide details on how to implement the new requirements. The bases changes provide guidance for changing Modes or other specified conditions in the Applicability when an LCO is not met. The bases changes describe in detail how:
  - LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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;
  - LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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; and
  - LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification, which is typically applied to Specifications which describe values and parameters (e.g., Containment Air Temperature, Containment Pressure, MCPR, Moderator Temperature Coefficient), though it may be applied to other Specifications based on NRC plant-specific approval.
3. The bases also state that any risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.160. “Monitoring the Effectiveness of Maintenance at Nuclear Power Plants,” and that the results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions.
4. In addition, the bases state that upon entry into a Mode or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable Actions until the condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the TS. The bases also state that SR 4.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 4.0.3. Finally, FPL has a bases



control program consistent with Section 5.5 of the STS, and the equivalent of STS SR 3.0.1 and associated bases.

#### **4.0 ENVIRONMENTAL EVALUATION**

FPL has evaluated the proposed amendment for environmental considerations. The review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set for in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

**Table of Affected Technical Specifications and Brief Description of Changes**

<i>Technical Specification No.</i>	<i>Description of Change</i>
LCO 3.0.4	Delete current LCO 3.0.4 and replace with TSTF-359 requirements.
SR 4.0.4	Delete current SR 4.0.4 and replace with TSTF-359 requirements.
LCO 3.2.4	Delete Action d, which provides an exception to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.3.3.3	Delete Action b, which provides an exception to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.4.4	Delete Action e, which provides an exception to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.4.8	Delete from Actions b and d the exceptions to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions. Add a new note to the Actions that LCO 3.0.4.c is applicable to Dose Equivalent I-131, consistent with TSTF-359.
LCO 3.4.9.3	Delete Action f, which provides an exception to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions. Add a new note to the Action that LCO 3.0.4.b is not applicable when entering Mode 4, consistent with TSTF-359.
LCO 3.5.2	Delete the LCO 3.0.4 exception included in the ** and *** footnotes. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.7.1.2	Delete from Action 3 the exceptions to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions. Add a new note to the Actions that LCO 3.0.4.b is not applicable to the required auxiliary feedwater trains when entering Mode 1. (The auxiliary feedwater system is not used for plant startup.)
LCO 3.7.1.7	Delete the LCO 3.0.4 exception included in the ** footnote. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.7.2	Delete from Action a the exceptions to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.7.3	Delete from Action a the exceptions to LCO 3.0.4. TSTF-359 removes existing LCO 3.0.4 exceptions.
LCO 3.8.1.1	Add a new note to the Action that LCO 3.0.4.b is not applicable to the diesel generators consistent with TSTF-359.
Bases for LCO 3.0.4	Revise bases to adopt TSTF-359 bases for STS LCO 3.0.4.
Bases for SR 4.0.1	Revise bases for consistency with bases for STS SR 3.0.1
Bases for SR 4.0.4	Revise bases to adopt TSTF-359 bases for STS SR 3.0.4.

Bases for LCO 3.4.8	Add a new discussion for the LCO 3.0.4.c allowance consistent with TSTF-359.
Bases for LCO 3.4.9.3.	Add a new discussion concerning the application of LCO 3.0.4.b consistent with TSTF-359.
Bases for LCO 3.7.1.2	Add a new discussion concerning the application of LCO 3.0.4.b consistent with TSTF-359.
LCO 3.8.1.1	Add a new discussion concerning the application of LCO 3.0.4.b consistent with TSTF-359.

**ATTACHMENT 2**

Markup of the Technical Specifications

#### **INSERT 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
- c. When an allowance is stated in the individual value, parameter, or other Specification.

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

#### **INSERT SR 4.0.4**

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified frequency, except as provided by Specification 4.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with Specification 3.0.4.

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

### 3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

#### 3/4.0 APPLICABILITY

##### LIMITING CONDITIONS FOR OPERATION

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3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.6. |

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals, except as provided in Specification 3.0.6. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required. |

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within 1 hour action shall be initiated to place the unit, as applicable, in:

- a. At least HOT STANDBY within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the action may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications.

This specification is not applicable in MODES 5 or 6.

~~3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.~~

INSERT LCO 3.0.4

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval. If an ACTION item requires periodic performance on a "once per . . ." basis, the above frequency extension applies to each performance after the initial performance. Exceptions to this Specification are stated in the individual Specifications.

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

If the surveillance is not performed within the delay period, the Limiting Condition of Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

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

~~4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation has been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.~~

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a. /

Inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50, Section 50.55a. /

**INSERT SR 4.0.4**

## POWER DISTRIBUTION LIMITS

### LIMITING CONDITION FOR OPERATION (Continued)

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#### ACTION (Continued)

2. Reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 2 hours and reduce the Power Range Neutron Flux-High Trip Setpoints to less than or equal to 55% of RATED THERMAL POWER within the next 4 hours; and
3. Identify and correct the cause of the out-of-limit condition prior to increasing THERMAL POWER; subsequent POWER OPERATION above 50% of RATED THERMAL POWER may proceed provided that the QUADRANT POWER TILT RATIO is verified within its limit at least once per hour for 12 hours or until verified at 95% or greater RATED THERMAL POWER.

~~d. The provisions of Specifications 3.0.4 are not applicable.~~

### SURVEILLANCE REQUIREMENTS

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4.2.4.1 The QUADRANT POWER TILT RATIO shall be determined to be within the limit above 50% of RATED THERMAL POWER by:

- a. Calculating the ratio in accordance with the Surveillance Frequency Control Program when the Power Range Upper Detector High Flux Deviation and Power Range Lower Detector High Flux Deviation Alarms are OPERABLE, and ✗
- b. Calculating the ratio at least once per 12 hours during steady-state operation when either alarm is inoperable.

4.2.4.2 The QUADRANT POWER TILT RATIO shall be determined to be within the limit when above 75% of RATED THERMAL POWER with one Power Range channel inoperable by using the movable incore detectors to confirm that the normalized symmetric power distribution, obtained either from two sets of four symmetric thimble locations or full-core flux map, or by incore thermocouple map is consistent with the indicated QUADRANT POWER TILT RATIO in accordance with the Surveillance Frequency Control Program. ✗

4.2.4.3 If the QUADRANT POWER TILT RATIO is not within its limit within 24 hours and the POWER DISTRIBUTION LIMITS of 3.2.2 and 3.2.3 are within their limits, a Special Report in accordance with 6.9.2 shall be submitted within 30 days including an evaluation of the cause of the discrepancy.



## INSTRUMENTATION

### ACCIDENT MONITORING INSTRUMENTATION

#### LIMITING CONDITION FOR OPERATION

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3.3.3.3 The accident monitoring instrumentation channels shown in Table 3.3-5 shall be OPERABLE.

APPLICABILITY: As shown in Table 3.3-5.

ACTION:

- a. As shown in Table 3.3-5.
- ~~b. The provisions of Specification 3.0.4 are not applicable to ACTIONS in Table 3.3-5 that require a shutdown.~~
- e. Separate Action entry is allowed for each Instrument.

 b

#### SURVEILLANCE REQUIREMENTS

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4.3.3.3 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION at the frequencies shown in Table 4.3-4.

REACTOR COOLANT SYSTEM

3/4.4.4 RELIEF VALVES

LIMITING CONDITION FOR OPERATION

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3.4.4 Both power-operated relief valves (PORVs) and their associated block valves shall be OPERABLE. /

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one or both PORVs inoperable because of excessive leakage, within 1 hour either restore the PORV(s) to OPERABLE status or close the associated block valve(s) with power maintained to the block valve(s); otherwise be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. /
- b. With one PORV inoperable due to causes other than excessive leakage, within 1 hour either restore the PORV to OPERABLE status or close its associated block valve and remove power from the block valve; otherwise, be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours. /
- c. With both PORVs inoperable due to causes other than excessive leakage, within 1 hour either restore at least one PORV to OPERABLE status or close each PORV's associated block valve and remove power from the block valve; with both block valves closed with power removed, restore at least one PORV to OPERABLE status within 30 days and restore power to its associated block valve; otherwise, be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours. /
- d. With one or both block valve(s) inoperable, within 1 hour either restore the block valve(s) to OPERABLE status or close the block valve(s) and remove power from the block valve(s); otherwise, place its associated PORV in manual control within the next hour and be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours. Restore at least one block valve to OPERABLE status within 30 days if both block valves are inoperable; otherwise, be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours. /
- e. ~~The provisions of Specification 3.0.4 are not applicable.~~ /

## REACTOR COOLANT SYSTEM

### 3/4.4.8 SPECIFIC ACTIVITY

#### LIMITING CONDITION FOR OPERATION

---

3.4.8 The specific activity of the primary coolant shall be limited to:

- a. Less than or equal to 0.25 microcuries per gram DOSE EQUIVALENT I-131, and
- b. Less than or equal to 447.7 microcuries per gram DOSE EQUIVALENT XE-133.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

-----NOTE-----  
LCO 3.0.4.c is applicable to DOSE  
EQUIVALENT I-131  
-----

- a. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131, verify DOSE EQUIVALENT I-131 is less than or equal to 60 microcuries per gram once per 4 hours.
- b. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131, but less than or equal to 60 microcuries per gram, operation may continue for up to 48 hours while efforts are made to restore DOSE EQUIVALENT I-131 to within the 0.25 microcuries per gram limit. ~~Specification 3.0.4 is not applicable.~~
- c. With the specific activity of the reactor coolant greater than 0.25 microcuries per gram DOSE EQUIVALENT I-131 for greater than or equal to 48 hours during one continuous time interval, or greater than 60 microcuries per gram DOSE EQUIVALENT I-131, be in HOT STANDBY within 6 hours and COLD SHUTDOWN within the next 30 hours.
- d. With the specific activity of the reactor coolant greater than 447.7 microcuries per gram DOSE EQUIVALENT XE-133, operation may continue for up to 48 hours while efforts are made to restore DOSE EQUIVALENT XE-133 to within the 447.7 microcuries per gram limit. ~~Specification 3.0.4 is not applicable.~~
- e. With the specific activity of the reactor coolant greater than 447.7 microcuries per gram DOSE EQUIVALENT XE-133 for greater than or equal to 48 hours during one continuous time interval, be in HOT STANDBY within 6 hours and COLD SHUTDOWN within the next 30 hours.

#### SURVEILLANCE REQUIREMENTS

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4.4.8 The specific activity of the reactor coolant shall be determined to be within the limits by performing the sampling and analysis described in Table 4.4-4.

REACTOR COOLANT SYSTEM

OVERPRESSURE MITIGATING SYSTEMS

LIMITING CONDITION FOR OPERATION

---

-----NOTE-----  
LCO 3.0.4.b is not applicable when  
entering MODE 4.  
-----

3.4.9.3 The high pressure safety injection flow paths to the Reactor Coolant System (RCS) shall be isolated, and at least one of the following Overpressure Mitigating Systems shall be OPERABLE:

- a. Two power-operated relief valves (PORVs) with a lift setting of  $\leq 448$  psig, or
- b. The RCS depressurized with a RCS vent of greater than or equal to 2.20 square inches.

APPLICABILITY MODES 4 (when the temperature of any RCS cold leg is less than or equal to 275°F), 5, and 6 with the reactor vessel head on.

ACTION:

- a. With the high pressure safety injection flow paths to the RCS unisolated, restore isolation of these flow paths within 4 hours.
- b. With one PORV inoperable in MODE 4 (when the temperature of any RCS cold leg is less than or equal to 275°F), restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.20 square inch vent within the next 8 hours.
- c. With one PORV inoperable in Modes 5 or 6 with the reactor vessel head on, either (1) restore the inoperable PORV to OPERABLE status within 24 hours, or (2) complete depressurization and venting of the RCS through at least a 2.20 square inch vent within a total of 32 hours, or (3) complete depressurization and venting of the RCS through at least one open PORV and associated block valve within a total of 32 hours.
- d. With both PORVs inoperable, either restore one PORV to OPERABLE status or complete depressurization and venting of the RCS through at least a 2.20 square inch vent within 24 hours.
- e. In the event either the PORVs or a 2.20 square inch vent is used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence. A Special Report is not required when such a transient is the result of water injection into the RCS for test purposes with an open vent path.
- f. ~~The provisions of Specification 3.0.4 are not applicable.~~

## EMERGENCY CORE COOLING SYSTEMS

### 3/4.5.2 ECCS SUBSYSTEMS - $T_{avg}$ GREATER THAN OR EQUAL TO 350°F

#### LIMITING CONDITION FOR OPERATION

3.5.2 The following Emergency Core Cooling System (ECCS) equipment and flow paths shall be OPERABLE:

- a. Four Safety Injection (SI) pumps, each capable of being powered from its associated OPERABLE diesel generator<sup>#</sup>, with discharge flow paths aligned to the RCS cold legs,\*
- b. Two RHR heat exchangers,
- c. Two RHR pumps with discharge flow paths aligned to the RCS cold legs,
- d. A flow path capable of taking suction from the refueling water storage tank as defined in Specification 3.5.4, and
- e. Two flow paths capable of taking suction from the containment sump.

APPLICABILITY: MODES 1, 2, and 3\*\*.

#### ACTION:

- a. With one RHR heat exchanger or suction flow path from the containment sump inoperable, restore the inoperable RHR heat exchanger or suction flow path from the containment sump to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. In the event the ECCS is actuated and injects water in the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date since January 1, 1990.
- c. With one of the four required Safety Injection pumps or its associated discharge flow path inoperable and the opposite unit in MODE 1, 2, or 3, restore the pump or flow path to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours.\*\*\*

---

\*Only three Safety Injection (SI) pumps (two associated with the unit and one from the opposite unit), each capable of being powered from its associated OPERABLE diesel generator<sup>#</sup>, with discharge flow paths aligned to the RCS cold leg are required if the opposite unit is in MODE 4, 5, or 6.

\*\*The provisions of Specifications ~~3.0.4 and~~ 4.0.4 are not applicable for entry into MODE 3 for the Safety Injection flow paths isolated pursuant to Specification 3.4.9.3 provided that the Safety Injection flow paths are restored to OPERABLE status prior to  $T_{avg}$  exceeding 380°F. Safety Injection flow paths may be isolated when  $T_{avg}$  is less than 380°F.

\*\*\*The provisions of Specifications ~~3.0.4 and~~ 4.0.4 are not applicable.

#Inoperability of the required diesel generators does not constitute inoperability of the associated Safety Injection pumps.

## PLANT SYSTEMS

### AUXILIARY FEEDWATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.7.1.2 Two independent auxiliary feedwater trains including 3 steam supply flowpaths, 3 pumps and associated discharge water flowpaths shall be OPERABLE.<sup>(1)(2)</sup>

APPLICABILITY: MODES 1, 2 and 3

ACTION:



-----NOTE-----  
LCO 3.0.4.b is not applicable to the required auxiliary  
feedwater trains when entering MODE 1.

- 1) With one of the two required independent auxiliary feedwater trains inoperable, either restore the inoperable train to an OPERABLE status within 72 hours, or place the affected unit(s) in at least HOT STANDBY within the next 6 hours\* and in HOT SHUTDOWN within the following 6 hours.
- 2) With both required auxiliary feedwater trains inoperable, within 2 hours either restore both trains to an OPERABLE status, or restore one train to an OPERABLE status and follow ACTION statement 1 above for the other train. If neither train can be restored to an OPERABLE status within 2 hours, verify the OPERABILITY of both standby feed-water pumps and place the affected unit(s) in at least HOT STANDBY within the next 6 hours\* and in HOT SHUTDOWN within the following 6 hours. Otherwise, initiate corrective action to restore at least one auxiliary feedwater train to an OPERABLE status as soon as possible and follow ACTION statement 1 above for the other train.
- 3) With a single auxiliary feedwater pump inoperable, within 4 hours, verify OPERABILITY of two independent auxiliary feedwater trains, or follow ACTION statements 1 or 2 above as applicable. Upon verification of the OPERABILITY of two independent auxiliary feedwater trains, restore the inoperable auxiliary feedwater pump to an OPERABLE status within 30 days, or place the operating unit(s) in at least HOT STANDBY within 6 hours\* and in HOT SHUTDOWN within the following 6 hours. ~~The provisions of Specification 3.0.4 are not applicable during the 30 day period for the inoperable auxiliary feedwater pump.~~
- 4) With a single steam supply flowpath inoperable, within 4 hours verify OPERABILITY of two independent steam supply flowpaths or follow ACTION statement 1 or 2 above as applicable. Upon verification of the OPERABILITY of two independent steam supply flowpaths, restore the inoperable steam supply flowpath to OPERABLE status within 7 days of discovery, or place the affected Unit(s) in at least HOT STANDBY within 6 hours\* and in HOT SHUTDOWN within the following 6 hours.

#### NOTES:

- (1) One steam supply flowpath shall be OPERABLE in each AFW train and the third steam supply flowpath (via MOV-3-1404 for Unit 3 and MOV-4-1404 for Unit 4) shall be OPERABLE and aligned to either AFW train but not both simultaneously.
- (2) During single and two unit operation, one pump shall be OPERABLE in each train and the third auxiliary feedwater pump shall be OPERABLE and capable of being powered from, and supplying water to either train, except as noted in ACTION 3 of Technical Specification 3.7.1.2. The third auxiliary feedwater pump (normally the "C" pump) can be aligned to either train to restore OPERABILITY in the event one of the required pumps is inoperable.

\*If this ACTION applies to both units simultaneously, be in at least HOT STANDBY within the next 12 hours and in HOT SHUTDOWN within the following 6 hours.

## PLANT SYSTEMS

### 3/4.7.1.7 FEEDWATER ISOLATION

#### LIMITING CONDITION FOR OPERATION

---

3.7.1.7 Six Feedwater Control Valves (FCVs) both main and bypass and six Feedwater Isolation Valves (FIVs) both main and bypass shall be OPERABLE.\*

APPLICABILITY: MODES 1, 2 and 3\*\*

ACTION:

- a. With one or more FCVs inoperable, restore operability, or close or isolate the inoperable FCVs within 72 hours and verify that the inoperable valve(s) is closed or isolated at least once per 7 days or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With one or more FIVs inoperable, restore operability, or close or isolate the inoperable FIV(s) within 72 hours and verify that the inoperable valve(s) is closed or isolated at least once per 7 days or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With one or more bypass valves in different steam generator flow paths inoperable, restore operability, or close or isolate the inoperable bypass valve(s) within 72 hours and verify that the inoperable valve(s) is closed or isolated at least once per 7 days or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- d. With two valves in the same steam generator flow paths inoperable, restore operability, or isolate the affected flowpath within 8 hours or be in HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours..

#### SURVEILLANCE REQUIREMENTS

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4.7.1.7 Each FCV, FIV and bypass valve shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program by:
  - 1) Verifying that each FCV, FIV and bypass valve actuates to the isolation position on an actual or simulated actuation signal.
- b. In accordance with the Inservice Testing Program by:
  - 1) Verifying that each FCV, FIV and bypass valve isolation time is within limits.

\*Separate Condition entry is allowed for each valve.

\*\*The provisions of specification ~~3.0.4 and~~ 4.0.4 are not applicable.

## PLANT SYSTEMS

### 3/4.7.2 COMPONENT COOLING WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.7.2 The Component Cooling Water System (CCW) shall be OPERABLE with:

- a. Three CCW pumps, and
- b. Two CCW heat exchangers.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With only two CCW pumps with independent power supplies OPERABLE, restore the inoperable CCW pump to OPERABLE status within 30 days or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ~~The provisions of Specification 3.0.4 are not applicable.~~
- b. With only one CCW pump OPERABLE or with two CCW pumps OPERABLE but not from independent power supplies, restore two pumps from independent power supplies to OPERABLE status within 72 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With less than two CCW heat exchangers OPERABLE, restore two heat exchangers to OPERABLE status within 1 hour or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.7.2 The Component Cooling Water System (CCW) shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program, by verifying that two heat exchangers and one pump are capable of removing design basis heat loads.



## PLANT SYSTEMS

### 3/4.7.3 INTAKE COOLING WATER SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.7.3 The Intake Cooling Water System (ICW) shall be OPERABLE with:

- a. Three ICW pumps, and
- b. Two ICW headers.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With only two ICW pumps with independent power supplies OPERABLE, restore the inoperable ICW pump to OPERABLE status within 14 days or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. ~~The provisions of Specification 3.0.4 are not applicable.~~
- b. With only one ICW pump OPERABLE or with two ICW pumps OPERABLE but not from independent power supplies, restore two pumps from independent power supplies to OPERABLE status within 72 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With only one ICW header OPERABLE, restore two headers to OPERABLE status within 72 hours or be in HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.7.3 The Intake Cooling Water System (ICW) shall be demonstrated OPERABLE:

- a. In accordance with the Surveillance Frequency Control Program by verifying that each valve (manual, power-operated, or automatic) servicing safety-related equipment that is not locked, sealed, or otherwise secured in position is in its correct position; and /
- b. In accordance with the Surveillance Frequency Control Program during shutdown, by verifying that: /
  - 1) Each automatic valve servicing safety-related equipment actuates to its correct position on a SI test signal, and
  - 2) Each Intake Cooling Water System pump starts automatically on a SI test signal.
  - 3) Interlocks required for system operability are OPERABLE.

-----NOTE-----  
LCO 3.0.4.b is not applicable to diesel generators  
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ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

---

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With one of two startup transformers or an associated circuit inoperable, demonstrate the OPERABILITY of the other startup transformer and its associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit is in MODE 1, reduce THERMAL POWER to  $\leq 30\%$  RATED THERMAL POWER within 24 hours, or restore the inoperable startup transformer and associated circuits to OPERABLE status within the next 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. If THERMAL POWER is reduced to  $\leq 30\%$  RATED THERMAL POWER within 24 hours or if the inoperable startup transformer is associated with the opposite unit restore the startup transformer and its associated circuits to OPERABLE status within 30 days of the loss of OPERABILITY, or be in at least HOT STANDBY within the next 12 hours and in COLD SHUTDOWN within the following 30 hours. If the inoperable startup transformer is the associated startup transformer and became inoperable while the unit was in MODE 2, 3, or 4 restore the startup transformer and its associated circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours. This ACTION applies to both units simultaneously.
  
- b. With one of the required diesel generators inoperable, demonstrate the OPERABILITY of the above required startup transformers and their associated circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventative maintenance or testing, demonstrate the OPERABILITY of the remaining required diesel generators by performing Surveillance Requirement 4.8.1.1.2.a.4 within 24 hours, unless the absence of any potential common mode failure for the remaining diesel generators is determined. If testing of remaining required diesel generators is required, this testing must be performed regardless of when the inoperable diesel generator is restored to OPERABILITY. Restore the inoperable diesel generator to OPERABLE status within 14 days\*\* or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
  
- c. With one startup transformer and one of the required diesel generators inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a on the remaining

---

\*\* 72 hours if inoperability is associated with Action Statement 3.8.1.1.c.

**ATTACHMENT 3**

**Change to the Technical Specification Bases**

### **INSERT BASES 3.0.4**

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It allows placing the unit in a MODE or other specified condition stated in that Applicability (e.g., the Applicability desired to be entered) when unit conditions are such that the requirements of the LCO would not be met, in accordance with LCO 3.0.4.a, LCO 3.0.4.b, or LCO 3.0.4.c.

LCO 3.0.4.a allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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. Compliance with ACTIONS that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the ACTIONS.

LCO 3.0.4.b allows entry into a MODE or other specified condition in the Applicability with the LCO not met 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.

The risk assessment may use quantitative, qualitative, or blended approaches, and the risk assessment will be conducted using the plant program, procedures, and criteria in place to implement 10 CFR 50.65(a)(4), which requires that risk impacts of maintenance activities to be assessed and managed. The risk assessment, for the purposes of LCO 3.0.4 (b), must take into account all inoperable Technical Specification equipment regardless of whether the equipment is included in the normal 10 CFR 50.65(a)(4) risk assessment scope. The risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." These documents address general guidance for conduct of the risk assessment, quantitative and qualitative guidelines for establishing risk management actions, and example risk management actions. These include actions to plan and conduct other activities in a manner that controls overall risk, increased risk awareness by shift and management personnel, actions to reduce the duration of the condition, actions to minimize the magnitude of risk increases (establishment of backup success paths or compensatory measures), and determination that the proposed MODE change is acceptable. Consideration should also be given to the probability of completing restoration such that the requirements of the LCO would be met prior to the expiration of allowed outage times that would require exiting the Applicability.

LCO 3.0.4.b may be used with single, or multiple systems and components unavailable. NUMARC 93-01 provides guidance relative to consideration of simultaneous unavailability of multiple systems and components.

The results of the risk assessment shall be considered in determining the acceptability of entering the MODE or other specified condition in the Applicability, and any corresponding risk management actions. The LCO 3.0.4.b risk assessments do not have to be documented.

The Technical Specifications allow continued operation with equipment unavailable in MODE 1 for the duration of the allowed outage time. Since this is allowable, and since in general the risk impact in that particular MODE bounds the risk of transitioning into and through the applicable MODES or other specified conditions in the Applicability of the LCO, the use of the LCO 3.0.4.b allowance should be generally acceptable, as long as the risk is assessed and managed as stated above. However, there is a small subset of systems and components that have been determined to be more important to risk and use of the LCO 3.0.4.b allowance is prohibited. The LCOs governing these system and components contain Notes prohibiting the use of LCO 3.0.4.b by stating that LCO 3.0.4.b is not applicable.

LCO 3.0.4.c allows entry into a MODE or other specified condition in the Applicability with the LCO not met based on a Note in the Specification, which states LCO 3.0.4.c, is applicable. These specific allowances permit entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered do not provide for continued operation for an unlimited period of time and a risk assessment has not been performed. This allowance may apply to all the ACTIONS or to a specific Required Action of a Specification. The risk assessments performed to justify the use of LCO 3.0.4.b usually only consider systems and components. For this reason, LCO 3.0.4.c is typically applied to Specifications which describe values and parameters (e.g., Reactor Coolant System Specific Activity), and may be applied to other Specifications based on NRC plant-specific approval.

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

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

Upon entry into a MODE or other specified condition in the Applicability with the LCO not met, LCO 3.0.1 and LCO 3.0.2 require entry into the applicable ACTIONS until the Condition is resolved, until the LCO is met, or until the unit is not within the Applicability of the Technical Specification.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 4.0.1. Therefore, utilizing LCO 3.0.4 is not a violation of SR 4.0.1 or SR 4.0.4 for any Surveillances that have not been performed on inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

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**ATTACHMENT 2**  
**Technical Specification Bases**

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**INSERT BASES 3.0.4**

3/4.0 (Continued)

~~Specification 3.0.4 establishes limitations on MODE changes when a Limiting Condition for Operation is **NOT** met. It precludes placing the facility in a higher MODE of operation when the requirements for a Limiting Condition for Operation are **NOT** met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in MODES were permitted. The purpose of this specification is to ensure that facility operation is **NOT** initiated or that higher MODES of operation are **NOT** entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a MODE change. Therefore, in this case, entry into an OPERATIONAL MODE or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should **NOT**, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.~~

~~When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do **NOT** apply because they would delay placing the facility in a lower MODE of operation.~~

**Specification 3.0.5** delineates the applicability of each specification to Unit 3 operation.

**Specification 3.0.6** establishes the allowance for restoring equipment to service under administrative controls when equipment has been removed from service or declared inoperable to comply with Technical Specification ACTION requirements. The sole purpose of this specification is to provide an exception to TS 3.0.1 and 3.0.2 (i.e., to **NOT** comply with the applicable required actions to allow the performance of required testing to demonstrate either:

- The OPERABILITY of the equipment being returned to service
- The OPERABILITY of other equipment.

### **INSERT A BASES 4.0.1**

- a. The systems or components are known to be inoperable, although still meeting the Surveillance Requirements; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

### **INSERT B BASES 4.0.1**

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given Surveillance Requirement. In this case, the unplanned event may be credited as fulfilling the performance of the Surveillance Requirement. This allowance includes those Surveillance Requirements whose performance is normally precluded in a given MODE or other specified condition.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment OPERABLE. This includes ensuring applicable Surveillances are not failed and their most recent performance is in accordance with SR 3.0.2. Post maintenance testing may not be possible in the current MODE or other specified conditions in the Applicability due to the necessary unit parameters not having been established. In these situations, the equipment may be considered OPERABLE provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a MODE or other specified condition where other necessary post maintenance tests can be completed.

An example of this process is Auxiliary feedwater (AFW) pump turbine maintenance during refueling that requires testing when steam pressure is adequate to perform the testing. However, if other appropriate testing is satisfactorily completed, the AFW System can be considered OPERABLE. This allows startup and other necessary testing to proceed until the plant reaches the steam pressure required to perform the testing.

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3/4.0 (Continued)

Specification 4.0.1 through 4.0.5 establishes the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met.

met

**Specification 4.0.1** establishes the requirement that surveillances must be ~~performed~~ during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the ~~operational status~~ of systems and components and that parameters are within specified limits ~~to ensure safe operation of the facility when the plant is in a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable.~~ Surveillance Requirements do **NOT** have to be performed when the facility is in an OPERATIONAL MODE for which the requirements of the associated Limiting Condition for operation do **NOT** apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

OPERABILITY



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This requirement also establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g., CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are ~~found or known to be inoperable although still meeting the Surveillance Requirements.~~

Surveillance Requirements do **NOT** have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

**Specification 4.0.2** establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may **NOT** be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is **NOT** significantly degraded beyond that obtained from the specified surveillance interval.

INSERT B  
BASES 4.0.1

INSERT A  
BASES  
4.0.1

#### **INSERT BASES 4.0.4**

SR 4.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

A provision is included to allow entry into a MODE or other specified condition in the Applicability when an LCO is not met due to Surveillance not being met in accordance with LCO 3.0.4.

However, in certain circumstances, failing to meet an SR will not result in SR 4.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per SR 4.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 4.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified frequency does not result in an SR 4.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes. SR 4.0.4 does not restrict changing MODES or other specified conditions of the Applicability when a Surveillance has not been performed within the specified frequency, provided the requirement to declare the LCO not met has been delayed in accordance with SR 4.0.3.

The provisions of SR 4.0.4 shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in MODE or other specified condition in the Applicability associated with transitioning from MODE 1 to MODE 2, MODE 2 to MODE 3, MODE 3 to MODE 4, and MODE 4 to MODE 5.

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3/4.0 (Continued)

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3, a 24 hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have **NOT** been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with ACTION requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. The provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of MODE changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is **NOT** completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are **NOT** met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do **NOT** have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

INSERT BASES 4.0.4

~~Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES or other specified conditions associated with plant shutdown as well as startup.~~

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~~Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to ensure that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.~~

~~When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do **NOT** apply because this would delay placing the facility in a lower MODE of operation.~~

**Specification 4.0.5** establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. Inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with the ASME Code of Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50.55a.

This Specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code or the ASME OM Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

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3/4.4.8 (Continued)

The RCS Specific activity satisfies Criterion 2 of 10 CFR 50.36(c)(2)(ii).

The iodine specific activity in the reactor coolant is limited to 0.25  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131, and the noble gas specific activity in the reactor coolant is limited to 447.7  $\mu\text{Ci/gm}$  DOSE EQUIVALENT XE-133. The limits on specific activity ensure that the offsite and Control Room doses will meet the appropriate SRP acceptance criteria.

The SLB, SGTR, Locked Rotor, and RCCA Ejection Accident analyses show that the calculated doses are within limits. Violation of the LCO may result in reactor coolant activity levels that could, in the event of any one of these accidents, lead to doses that exceed the acceptance criteria.

The ACTIONS permit limited operation when DOSE EQUIVALENT I-131 is greater than 0.25  $\mu\text{Ci/gm}$  and less than 60  $\mu\text{Ci/gm}$ . The Actions require sampling within 4 hours and every 4 hours following to establish a trend.

One surveillance requires performing a gamma isotropic analysis as a measure of noble gas specific activity of the reactor coolant in accordance with the Surveillance Frequency Control Program. This measurement is the sum of the degassed gamma activities and the gaseous gamma activities in the sample taken. This surveillance provides an indication of any increase in the noble gas specific activity.

A second surveillance is performed to ensure that iodine specific activity remains within the LCO limit in accordance with the Surveillance Frequency Control Program during normal operation and following fast power changes when iodine spiking is more apt to occur. The frequency between 2 and 6 hours after a power change of greater than 15% RATED THERMAL POWER within a 1 hour period, is established because the iodine levels peak during this time following iodine spike initiation.

A Note permits the use of LCO 3.0.4.c for DOSE EQUIVALENT I-131. This allowance permits entry into applicable MODE(S) while relying on the ACTIONS.


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3/4.4.9 (Continued)

Overpressure Mitigating System

The Technical Specifications provide requirements to isolate High Pressure Safety Injection from the RCS and to prevent the start of an idle RCP if secondary temperature is more than 50°F above the RCS cold leg temperatures. These requirements are designed to ensure that mass and heat input transients more severe than those assumed in the low temperature overpressurization protection analysis cannot occur.



The OPERABILITY of two PORVs or an RCS vent opening of at least 2.20 square inches ensures that the RCS will be protected from pressure transients which could exceed the limits of Appendix G to 10 CFR Part 50 when one or more of the RCS cold legs are less than or equal to 275°F. Either PORV has adequate relieving capability to protect the RCS from overpressurization when the transient is limited to either: (1) The start of an idle RCP with the secondary water temperature of the steam generator less than or equal to 50°F above the RCS cold leg temperatures including margin for instrument error, or (2) The start of a HPSI pump and its injection into a water-solid RCS. When the PORVs or 2.2 square inch area vent is used to mitigate a plant transient, a Special Report is submitted. However, minor increases in pressure resulting from planned plant actions, which are relieved by designated openings in the system, need **NOT** be reported.

Associated requirements for accomplishing specific tests and verifications in SR 4.4.9.3.1.a and 4.4.9.3.1.d allow a 12 hour delay after decreasing RCS cold leg temperature to  $\leq 275^{\circ}\text{F}$ . The bases for the 12 hour relief in completing the ANALOG CHANNEL OPERATION TEST (ACOT) and verifying the OPERABILITY of the backup Nitrogen supply are provided in the proposed license amendment correspondence L-2000-146 and in the NRC Safety Evaluation Report provided in the associated Technical Specification Amendments 208/202 effective October 30, 2000.

A Note prohibits application of LCO 3.0.4.b to an inoperable overpressure mitigating system. There is an increased risk associated with entering MODE 4 from MODE 5 with the overpressure mitigating system inoperable and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, cannot be applied in this circumstance.

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3/4.7.1.2 Auxiliary Feedwater System

**NOTE**

**Interim Compensatory Measure (ICM)**

With one of the three steam supply flowpaths inoperable, within 4 hours verify OPERABILITY of two independent steam supply flowpaths or follow ACTION statement 1 or 2 as applicable. Upon verification of the OPERABILITY of two independent steam supply flowpaths, restore the inoperable steam supply flowpath to OPERABLE status within 7 days of discovery, or place the affected Unit(s) in at least HOT STANDBY within 6 hours (12 hours if this applies to both units simultaneously) and in HOT SHUTDOWN within the following 6 hours. This ICM will be effective until License Amendment Request 245 is approved by the NRC and implemented. (Reference: AR 1937353)

The OPERABILITY of the Auxiliary Feedwater System ensures that the Reactor Coolant System can be cooled down to less than 350°F from normal operating conditions in the event of a total Loss-Of-Offsite Power. Steam can be supplied to the pump turbines from either or both units through redundant steam headers. Two D.C. motor operated valves and one A.C. motor operated valve on each unit isolate the three main steam lines from these headers. Both the D.C. and A.C. motor operated valves are powered from safety-related sources. Auxiliary feedwater can be supplied through redundant lines to the safety-related portions of the main feedwater lines to each of the steam generators. Air operated fail closed flow control valves are provided to modulate the flow to each steam generator. Each Steam Driven Auxiliary Feedwater Pump has sufficient capacity for single and two unit operation to ensure that adequate feedwater flow is available to remove decay heat and reduce the Reactor Coolant System temperature to less than 350°F when the Residual Heat Removal System may be placed into operation.

A Note prohibits application of LCO 3.0.4.b to an inoperable Auxiliary Feedwater train when entering MODE 1. There is an increased risk associated with entering MODE 1 with a train of Auxiliary Feedwater inoperable and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, cannot be applied in this circumstance.

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ACTION statement 2 describes the actions to be taken when both Auxiliary Feedwater Trains are inoperable. The requirement to verify the availability of both Standby Feedwater Pumps is to be accomplished by verifying that both pumps have successfully passed their surveillance tests within the last surveillance interval. The requirement to complete this action before beginning a unit shutdown is to ensure that an alternate feedwater train is available before putting the affected unit through a transient. If **NO** alternate feedwater trains are available, the affected unit is to stay at the same condition until an auxiliary feedwater train is returned to service, and then invoke ACTION statement 1 for the other train. If both Standby Feedwater Pumps are made available before one Auxiliary Feedwater Train is returned to an OPERABLE status, then the affected units shall be placed in at least HOT STANDBY within 6 hours and HOT SHUTDOWN within the following 6 hours.

ACTION statement 3 describes the actions to be taken when a single Auxiliary Feedwater Pump is inoperable. The requirement to verify that two independent Auxiliary Feedwater Trains are OPERABLE is to be accomplished by verifying that the requirements for Table 3.7-3 have been successfully met for each train within the last surveillance interval. ~~The provisions of Specification 3.0.4 are **NOT** applicable to the third auxiliary feedwater pump provided it has **NOT** been inoperable for longer than 30 days. This means that a units can change OPERATIONAL MODES during a unit's heatup with a single Auxiliary Feedwater Pump inoperable as long as the requirements of ACTION Statement 3 are satisfied.~~



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As each Startup Transformer only provides the limited equivalent power of approximately one EDG to the opposite Units A-train 4160 volt bus, the allowable out-of-service time of 30 days has been applied before the opposite unit is required to be shutdown. Within 24 hours, a unit with an inoperable Startup Transformer must reduce THERMAL POWER to less than or equal to 30% RATED THERMAL POWER. The 30% RATED THERMAL POWER limit was chosen because at this power level the decay heat and fission product production has been reduced and the operators are still able to maintain automatic control of the Feedwater Trains and other unit equipment. At lower power levels the operators must use manual control with the Feedwater Bypass lines. By **NOT** requiring a complete unit shutdown, the plant avoids a condition requiring natural circulation and avoids intentionally relying on engineered safety features for non-accident conditions.

With one startup transformer and one of the three required EDGs inoperable, the unit with the inoperable transformer must reduce THERMAL POWER to less than or equal to 30% RATED THERMAL POWER within 24 hours, based on the loss of its associated Startup Transformer, whereas operation of the unit with the OPERABLE transformer is controlled by the limits for inoperability of the EDG. The notification of a loss of Startup Transformers to the NRC (ACTION STATEMENT 3.8.1.1.c) is **NOT** a 10 CFR 50.72/50.73 requirement and as such will be made for information purposes only to the NRC Operations Center via commercial lines.

A Note prohibits application of LCO 3.0.4.b to an inoperable EDG. There is an increased risk associated with entering a MODE or other specified condition in the Applicability with an inoperable EDG and the provisions of LCO 3.0.4.b, which allow entry into a MODE or other specified condition in the Applicability with the LCO not met after performance of a risk assessment addressing inoperable systems and components, cannot be applied in this circumstance.

**ATTACHMENT 4**  
**Regulatory Commitment**

The following table identifies those actions committed to by FPL in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

<b>Regulatory Commitment</b>	<b>Due Date / Event</b>
FPL will establish the Technical Specification Bases for LCO 3.0.4 and SR 4.0.4 as adopted with the applicable license amendment.	Upon implementation of the license amendment