

NRR-DMPSPeM Resource

From: Kilby, Gary <Gary.Kilby@fpl.com>
Sent: Monday, April 23, 2018 1:45 PM
To: Poole, Justin
Cc: Catron, Steve
Subject: [External_Sender] LCO 3.0.6 LAR Pre-submittal Call
Attachments: Example Markups and Table LAR LCO 3-0-6.pdf

Justin:

Attached are some draft example mark-ups of the technical specifications to support tomorrow's call regarding the LAR to adopt LCO 3.0.6.

GLK

Hearing Identifier: NRR_DMPS
Email Number: 391

Mail Envelope Properties (384fe12b46184348a3d99d0e7e40803f)

Subject: [External_Sender] LCO 3.0.6 LAR Pre-submittal Call
Sent Date: 4/23/2018 1:45:26 PM
Received Date: 4/23/2018 1:46:16 PM
From: Kilby, Gary

Created By: Gary.Kilby@fpl.com

Recipients:
"Catron, Steve" <Steve.Catron@fpl.com>
Tracking Status: None
"Poole, Justin" <Justin.Poole@nrc.gov>
Tracking Status: None

Post Office: fpl.com

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MESSAGE	157	4/23/2018 1:46:16 PM
Example Markups and Table LAR LCO 3-0-6.pdf		1223340

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION 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 3.0.5.~~

~~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 3.0.5. 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 in a MODE in which the specification does not apply by placing it, 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 MODE 5 or 6.

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

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3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2.

3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated ACTIONS shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified time interval, completion of the required ACTION(S) is not required unless otherwise stated.

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APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.4 (Continued)

INSERT LCO
3.0.6

- 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.

3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

SURVEILLANCE REQUIREMENTS

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 meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified surveillance interval shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, 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 for 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 for Operation must immediately be declared not met, and the applicable ACTION(s) must be entered.

INSERT LCO 3.0.6

- 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the ACTIONS associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 6.7.6.o, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate ACTIONS of the LCO in which the loss of safety function exists are required to be entered.

When a support system's ACTION directs a supported system to be declared inoperable or directs entry into the ACTIONS for a supported system, the applicable ACTIONS shall be entered in accordance with LCO 3.0.2.

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CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 Each containment isolation valve shall be OPERABLE*.

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

ACTION:

With one or more of the isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Not used

4.6.3.2 Each containment isolation valve shall be demonstrated OPERABLE during shutdown in accordance with the Surveillance Frequency Control Program by:

- a. Verifying that on a Phase "A" Isolation test signal, each Phase "A" Isolation valve actuates to its isolation position,
- b. Verifying that on a Phase "B" Isolation test signal, each Phase "B" Isolation valve actuates to its isolation position, and

-----NOTES-----
1. Enter applicable ACTIONS for system made inoperable by containment isolation valves
2. Enter the ACTION of LCO 3.6.1.2, "Containment Leakage," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.

*Locked or sealed closed valves may be opened on an intermittent basis under administrative control.

Seabrook

Table of Support System Actions that Direct Entering Actions of Supported Systems

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ATTACHMENT 3

Table of Support System Actions that Direct Entering Actions of Supported Systems (Seabrook)

ISTS LCO	ISTS Action or Note	Seabrook TS LCO	Seabrook Proposed TS Action or Note
3.3.5, LOP DG Start Instrumentation	C.1 Enter applicable Condition(s) and Required Action(s) for the associated DG made inoperable by LOP DG start instrumentation.	N/A	Seabrook TS do not include an LCO for LOP DG Start Instrumentation.
3.3.6, Containment Purge and Exhaust Isolation Instrumentation	B.1 Enter applicable Conditions and Required Actions of LCO 3.6.3, "Containment Isolation Valves," for containment purge and exhaust isolation valves made inoperable by isolation instrumentation. C.2 Enter applicable Conditions and Required Actions of LCO 3.9.4, "Containment Penetrations," for containment purge and exhaust isolation valves made inoperable by isolation instrumentation.	N/A	Seabrook TS do not include an LCO for Containment Purge and Exhaust Isolation Instrumentation.
3.3.7, CREFS Actuation Instrumentation	B.1.2 Enter applicable Conditions and Required Actions for one CREFS train made inoperable by inoperable CREFS actuation instrumentation.	N/A	Seabrook TS do not include an LCO for CREFS Actuation Instrumentation.
3.3.8, FBACS Actuation Instrumentation	B.1.2 Enter applicable Conditions and Required Actions of LCO 3.7.13, "Fuel Building Air Cleanup System (FBACS)," for one train made inoperable by inoperable actuation instrumentation.	N/A	Seabrook TS do not include an LCO for FBACS Actuation Instrumentation
3.4.14, RCS PIV Leakage	2. Enter applicable Conditions and Required Actions for systems made inoperable by an inoperable PIV.	3.4.6.2, Reactor Coolant System Leakage	Proposed note to Action c: Enter applicable ACTIONS for systems made inoperable by an inoperable pressure isolation valve.

ATTACHMENT 3

Table of Support System Actions that Direct Entering Actions of Supported Systems (Seabrook)

ISTS LCO	ISTS Action or Note	Seabrook TS LCO	Seabrook Proposed TS Action or Note
3.6.2, Containment Air Locks	3. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when air lock leakage results in exceeding the overall containment leakage rate.	3.6.1.3, Containment Air Locks	Proposed note to Actions: Enter the ACTION of LCO 3.6.1.2, "Containment Leakage," when air lock leakage results in exceeding the overall containment leakage rate.
3.6.3, Containment Isolation Valves	3. Enter applicable Conditions and Required Actions for systems made inoperable by containment isolation valves. 4. Enter applicable Conditions and Required Actions of LCO 3.6.1, "Containment," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.	3.6.3, Containment Isolation Valves	Proposed notes to Actions: 1. Enter applicable ACTIONS for systems made inoperable by containment isolation valves. 2. Enter the ACTION of LCO 3.6.1.2, "Containment Leakage," when isolation valve leakage results in exceeding the overall containment leakage rate acceptance criteria.
3.7.7, Component Cooling Water	A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops - MODE 4," for residual heat removal loops made inoperable by CCW.	3.7.3, Primary Component Cooling Water	Proposed note to Action: Enter applicable ACTIONS of LCO 3.4.1.3, "Reactor Coolant Loops and Coolant Circulation," for residual heat removal loop made inoperable by PCCW.
3.7.8, Service Water	A.1 -----NOTES----- 1. Enter applicable Conditions and Required Actions of LCO 3.8.1, "AC Sources - Operating," for emergency diesel generator made inoperable by SWS. 2. Enter applicable Conditions and Required Actions of LCO 3.4.6, "RCS Loops- MODE 4," for residual heat removal loops made inoperable by SWS.	3.7.4, Service Water/Ultimate Heat Sink	Proposed notes to Action: 1. Enter applicable ACTIONS of LCO 3.8.1.1, "AC Sources - Operating," for diesel generator made inoperable by service water. 2. Enter applicable ACTION of LCO 3.4.1.3, Reactor Coolant Loops and Coolant Circulation," for residual heat removal loop made inoperable by service

ATTACHMENT 3

Table of Support System Actions that Direct Entering Actions of Supported Systems (Seabrook)

ISTS LCO	ISTS Action or Note	Seabrook TS LCO	Seabrook Proposed TS Action or Note
3.8.1, AC Sources - Operating	A.2 Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable.		water. Proposed change to Action a to add: Declare required feature(s) with no offsite power available inoperable when its redundant required feature(s) is inoperable within 24 hours from discovery of no offsite power to one train concurrent with inoperability of redundant required feature(s);
3.8.2, AC Sources - Shutdown	B.2 Declare required feature(s) supported by the inoperable DG inoperable when its required redundant feature(s) is inoperable. C.1 Declare required feature(s) inoperable when its redundant required feature(s) is inoperable.	3.8.1.1, AC Sources - Operating	No change required. Action d provides the necessary restriction for cross train inoperabilities. Proposed change to Action e to add: Declare required feature(s) inoperable when its redundant required feature(s) is inoperable within 12 hours from discovery two offsite circuits inoperable concurrent with inoperability of redundant required feature(s);
	D. -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating," when Condition D is entered with no AC power source to any train.		Proposed Note to Action c: Enter applicable ACTIONs of LCO 3.8.3.1, Onsite Power Distribution - Operating," when ACTION c is entered with no AC power to any train.
	A. -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.10, with one required train de-energized	3.8.1.2, A.C. Sources - Shutdown	Proposed note to Action: Enter the ACTION of LCO 3.8.3.2, "Onsite Power Distribution – Shutdown," when one required train de-energized as a

ATTACHMENT 3

Table of Support System Actions that Direct Entering Actions of Supported Systems (Seabrook)

ISTS LCO	ISTS Action or Note	Seabrook TS LCO	Seabrook Proposed TS Action or Note
	as a result of Condition A.		result of inoperable offsite circuit.
3.8.7, Inverters - Operating	A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.9, "Distribution Systems - Operating" with any AC vital bus deenergized.	N/A	Seabrook TS do not include an LCO for Inverters- Operating
3.8.9, Distribution Systems - Operating	A.1 -----NOTE----- Enter applicable Conditions and Required Actions of LCO 3.8.4, "DC Sources - Operating," for DC trains made inoperable by inoperable power distribution subsystems.	3.8.3.1, Onsite Power Distribution - Operating	Proposed note to Action a: Enter applicable ACTION of LCO 3.8.2.1, "DC Sources - Operating," for DC trains made inoperable by inoperable AC power distribution system.