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10 CFR 50.90

RS-19-071
JAFP-19-0067
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June 27, 2019

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

Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Nine Mile Point Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-63
NRC Docket No. 50-220

Peach Bottom Atomic Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

R. E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244

Subject: Application to Adopt TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY"

References:
1. TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY," dated May 3, 2006 (ML061240055).
2. Notice of Availability of Model Application Concerning Technical Specification Improvement to Modify Requirements Regarding the Addition of LCO 3.0.9 on the Unavailability of Barriers Using the Consolidated Line Item Improvement Process, dated October 3, 2006 (71 Fed. Reg. 58444).
3. "Summary of October 23, 2018, Meeting with Exelon Generation Company, LLC Regarding Planned License Amendment Request to Adopt TSTF-427 (EPID L-2018-LRM-0062)," dated October 26, 2018 (ML18297A172).

In accordance with the provisions of 10 CFR 50.90, Exelon Generation Company, LLC (EGC) is submitting a request for an amendment to the Technical Specifications (TS) for the stations identified above. The proposed amendment would modify TS requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9, or its equivalent. The proposed changes are consistent with NRC approved Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY," dated May 3, 2006 (Reference 1). The availability of this TS improvement was announced in the *Federal Register* on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP) (Reference 2).

The proposed changes have been reviewed and recommended for approval by the affected Plant Operations Review Committees in accordance with the EGC Quality Assurance Program. In addition, the proposed changes were discussed in a meeting with the U.S. Nuclear Regulatory Commission Staff as described in the Reference 3 letter.

Attachment 1 provides a description of the proposed changes. Attachment 2 provides the existing TS pages marked up to show the proposed changes. Attachment 3 provides the existing TS Bases pages marked up to show the proposed changes (for information only). Attachment 4 provides a summary of commitments.

EGC requests approval of the proposed License Amendment by June 27, 2020, with the amendment being implemented within 120 days of issuance.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), a copy of this application, with attachments, is being provided to the designated State Officials.

Should you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of June 2019.

Respectfully,

David T. Gudger for

James Barstow
Director - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachments:
1. Description and Assessment
2. Proposed Technical Specifications Changes (Mark-Ups)
3. Proposed Technical Specifications Bases Changes (Mark-Ups) (For Information Only)
4. Summary of Commitments

cc: Regional Administrator - NRC Region I
Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Clinton Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Limerick Generating Station
NRC Senior Resident Inspector - Nine Mile Point Nuclear Station
NRC Senior Resident Inspector - Peach Bottom Atomic Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - R. E. Ginna Nuclear Power Plant
NRC Project Manager - Braidwood Station
NRC Project Manager - Byron Station
NRC Project Manager - Clinton Power Station
NRC Project Manager - Dresden Nuclear Power Station
NRC Project Manager - James A. FitzPatrick Nuclear Power Plant
NRC Project Manager - LaSalle County Station
NRC Project Manager - Limerick Generating Station
NRC Project Manager - Nine Mile Point Nuclear Station
NRC Project Manager - Peach Bottom Atomic Power Station
NRC Project Manager - Quad Cities Nuclear Power Station
NRC Project Manager - R. E. Ginna Nuclear Power Plant
Illinois Emergency Management Agency – Division of Nuclear Safety
D. A. Tancabel, State of Maryland
A. L. Peterson, NYSERDA

Attachment 1
Description and Assessment

Subject: Application to Adopt TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY"

Attachment 1
Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify Technical Specification (TS) requirements for unavailable barriers by adding Limiting Condition for Operation (LCO) 3.0.9, or its equivalent.

The proposed changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Standard Technical Specifications change TSTF-427, Revision 2, "Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY." The availability of this TS improvement was announced in the Federal Register on October 3, 2006 (71 FR 58444) as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

Exelon Generation Company, LLC (EGC) has reviewed the safety evaluation (71 FR 58444) dated October 3, 2006 as part of the CLIIP. This included a review of the NRC evaluation, as well as information provided to support TSTF-427. EGC has concluded that the justifications presented in the TSTF-427 proposal and the corresponding NRC safety evaluation are applicable to: 1) Braidwood Station, Units 1 and 2; 2) Byron Station, Units 1 and 2; 3) Clinton Power Station, Unit 1; 4) Dresden Nuclear Power Station, Units 2 and 3; 5) James A. FitzPatrick Nuclear Power Plant; 6) LaSalle County Station, Units 1 and 2; 7) Limerick Generating Station, Units 1 and 2; 8) Nine Mile Point Nuclear Station, Unit 1; 9) Peach Bottom Atomic Power Station, Units 2 and 3; 10) Quad Cities Nuclear Power Station, Units 1 and 2; and 11) R. E. Ginna Nuclear Power Plant, and justify this amendment for the incorporation of the changes to their TS.

2.2 Optional Changes and Variations

EGC is proposing one variation from the TS changes described in TSTF-427, Revision 2, or the NRC model safety evaluation dated October 3, 2006 related to the Nine Mile Point Nuclear Station, Unit 1. The Nine Mile Point Nuclear Station, Unit 1 TS are custom format and the markups for LCO 3.0.9 are modified to accommodate this difference. This change is administrative and acceptable. Additionally, the Nine Mile Point Nuclear Station, Unit 1 TS do not have LCO 3.0.2 and 3.0.3 incorporated and the TS Bases have been modified accordingly to remove reference to LCO 3.0.2 and 3.0.3. This change does not impact the approved safety evaluation for TSTF-427.

No other variations or deviations from the TS changes described in TSTF-427, Revision 2, or the NRC model safety evaluation dated October 3, 2006 are being proposed.

The mark-up of the TS Bases associated with LCO 3.0.9, or its equivalent, as presented in TSTF-427 is included in Attachment 3 for information purposes. The LCO 3.0.9 Bases in TSTF-427 indicates that risk assessments will be conducted using the procedures and guidance endorsed by Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." In the Federal Register dated November 27, 2012 (77 FR 70846), the NRC provided notice that Regulatory Guide 1.182 had been withdrawn and the subject matter had been incorporated into Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." The TSTF issued a letter

(Reference 1) noting which approved TSTF travelers are affected and described the effect of withdrawal of Regulatory Guide 1.182. An NRC letter (Reference 2) endorsed the TSTF's approach in the handling of future license amendment requests. As such, EGC is referencing Regulatory Guide 1.160 in the TS Bases associated with this amendment request.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

EGC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the Consolidated Line Item Improvement Process (CLIIP). EGC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to: 1) Braidwood Station, Units 1 and 2; 2) Byron Station, Units 1 and 2; 3) Clinton Power Station, Unit 1; 4) Dresden Nuclear Power Station, Units 2 and 3; 5) James A. FitzPatrick Nuclear Power Plant; 6) LaSalle County Station, Units 1 and 2; 7) Limerick Generating Station, Units 1 and 2; 8) Nine Mile Point Nuclear Station, Unit 1; 9) Peach Bottom Atomic Power Station, Units 2 and 3; 10) Quad Cities Nuclear Power Station, Units 1 and 2; and 11) R. E. Ginna Nuclear Power Plant, and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a), "Notice for public comment."

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on October 3, 2006 for this TS improvement, plant-specific verifications will be performed as follows:

1. EGC commits to the guidance of NUMARC 93-01 Section 11, which provides guidance and details on the assessment and management of risk during maintenance.

2. EGC will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 (Reference 3) is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9, or its equivalent, are to be applied, in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.

3.3 Precedent

TSTF-427 has been approved for several nuclear facilities. A few representative approvals are provided below.

1. Letter from T. Wengert (U.S. Nuclear Regulatory Commission) to ANO Site Vice President Arkansas Nuclear One (Entergy Operations, Inc.), "Arkansas Nuclear One, Unit 1 – Issuance of Amendment to Adopt TSTF-427, 'Allowance for Non Technical Specification Barrier Degradation on Supported System Operability' (CAC No. MG0132; EPID L-2017-LLA-0301)," dated February 26, 2018 (ML18033A175).

2. Letter from T. Wengert (U.S. Nuclear Regulatory Commission) to ANO Site Vice President Arkansas Nuclear One (Entergy Operations, Inc.), "Arkansas Nuclear One, Unit 2 – Issuance of Amendment to Adopt TSTF-427, 'Allowance for Non Technical

Specification Barrier Degradation on Supported System Operability' (CAC No. MG0131; EPID L-2017-LLA-0302)," dated February 26, 2018 (ML18051A589).

3. Letter from S. Lingam (U.S. Nuclear Regulatory Commission) to Vice President, Operations (Entergy Operations, Inc.), "Grand Gulf Nuclear Station, Unit 1 - Issuance of Amendment to Adopt Technical Specifications Task Force (TSTF)-427, Revision 2, 'Allowance for Non Technical Specification Barrier Degradation on Supported System Operability,' (CAC No. MF8692)," dated June 7, 2017 (ML17116A032).

4. Letter from R. Guzman (U.S. Nuclear Regulatory Commission) to S. Belcher (Nine Mile Point Nuclear Station, LLC (now Exelon Generation Company, LLC)), "Nine Mile Point Nuclear Station, Unit No. 2 - Issuance of Amendment Regarding Modification to Requirements for Unavailable Barriers by Adding Limiting Conditions for Operation 3.0.9 Using the Consolidated Line Item Improvement Process (TAC No. ME2994)," dated June 29, 2010 (ML101580181).

4.0 ENVIRONMENTAL EVALUATION

EGC has reviewed the environmental evaluation included in the model safety evaluation dated October 3, 2006 as part of the CLIIP. EGC has concluded that the staff's findings presented in that evaluation are applicable to: 1) Braidwood Station, Units 1 and 2; 2) Byron Station, Units 1 and 2; 3) Clinton Power Station, Unit 1; 4) Dresden Nuclear Power Station, Units 2 and 3; 5) James A. FitzPatrick Nuclear Power Plant; 6) LaSalle County Station, Units 1 and 2; 7) Limerick Generating Station, Units 1 and 2; 8) Nine Mile Point Nuclear Station, Unit 1; 9) Peach Bottom Atomic Power Station, Units 2 and 3; 10) Quad Cities Nuclear Power Station, Units 1 and 2; and 11) R. E. Ginna Nuclear Power Plant, and the evaluation is hereby incorporated by reference for this application.

5.0 REFERENCES

1. Letter from the Technical Specifications Task Force to U.S. Nuclear Regulatory Commission, "Revision of References to Regulatory Guide 1.182 in Approved Travelers," TSTF-14-10, dated September 16, 2014 (ML14259A575).

2. Letter from A. Mendiola (U.S. Nuclear Regulatory Commission) to Technical Specifications Task Force (TSTF), "U.S. Nuclear Regulatory Commission Response to the TSTF Letter Regarding References to Regulatory Guide 1.182 in Approved Travelers," dated February 26, 2015 (ML15033A152).

3. NEI 04-08, "Allowance for Non-Technical Specification Barrier Degradation on Supported System OPERABILITY (TSTF-427)," dated March 2006 (ML061220426).

Attachment 2

Proposed Technical Specifications Changes (Mark-Ups)

Attachment 2A

Proposed Technical Specifications Changes (Mark-Ups)

Braidwood Station, Units 1 and 2

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.9

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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 ~~and~~ LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 7 hours;

b. MODE 4 within 13 hours; and

c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

3.0 LCO Applicability

LCO 3.0.7	Exception LCOs allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Exception LCOs is optional. When an Exception LCO is desired to be met but is not met, the ACTIONS of the Exception LCO shall be met. When an Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.
LCO 3.0.8	LCOs, including associated ACTIONs, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONs will apply to both units simultaneously.

INSERT 1A

INSERT 1A

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2B

Proposed Technical Specifications Changes (Mark-Ups)

Byron Station, Units 1 and 2

TECHNICAL SPECIFICATION PAGES

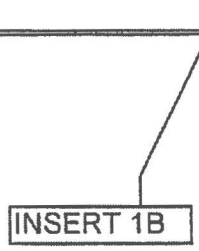
, and LCO 3.0.9

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO	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 ~~and~~ LCO 3.0.7.
LCO	3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.
LCO	3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in: a. MODE 3 within 7 hours; b. MODE 4 within 13 hours; and c. MODE 5 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

3.0 LCO Applicability

LCO 3.0.7	Exception LCOs allow specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Exception LCOs is optional. When an Exception LCO is desired to be met but is not met, the ACTIONS of the Exception LCO shall be met. When an Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.
LCO 3.0.8	LCOs, including associated ACTIONs, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONs will apply to both units simultaneously.



INSERT 1B

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2C

Proposed Technical Specifications Changes (Mark-Ups)

Clinton, Unit 1

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.9

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7, ~~and~~ LCO 3.0.8
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in: a. MODE 2 within 7 hours; b. MODE 3 within 13 hours; and c. MODE 4 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, and 3.
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; (continued)

3.0 LCO APPLICABILITY (continued)

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

INSERT 1C

INSERT 1C

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Core Spray system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2D

Proposed Technical Specifications Changes (Mark-Ups)

Dresden Nuclear Power Station, Units 2 and 3

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.10

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7, ~~and~~ LCO 3.0.8.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 13 hours; and

b. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

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

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9 LCOs, including associated ACTIONS, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONS will apply to both units simultaneously.

INSERT 1D

INSERT 1D

LCO 3.0.10 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection system, the Isolation Condenser system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2E

Proposed Technical Specifications Changes (Mark-Ups)

James A. FitzPatrick Nuclear Power Plant

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.9

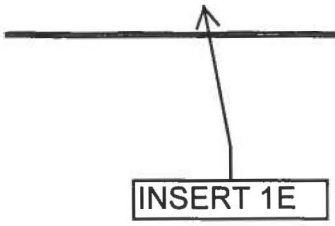
LCO Applicability 3.0

LCO 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 ~~and~~ LCO 3.0.7.
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the plant shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the plant, as applicable, in: a. MODE 2 within 7 hours; b. MODE 3 within 13 hours; and c. MODE 4 within 37 hours. Exceptions to this Specification are stated in the individual Specifications. Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required. LCO 3.0.3 is only applicable in MODES 1, 2, and 3.
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;

(continued)

LCO APPLICABILITY (continued)

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.



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LCO 3.0.8 RESERVED

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2F

Proposed Technical Specifications Changes (Mark-Ups)

LaSalle County Station, Units 1 and 2

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.10

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7, ~~and~~ LCO 3.0.8

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 7 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

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;

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9

LCOs, including associated ACTIONS, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONS will apply to both units simultaneously.

INSERT 1F

INSERT 1F

LCO 3.0.10 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Core Spray system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2G

Proposed Technical Specifications Changes (Mark-Ups)

Limerick Generating Station, Units 1 and 2

TECHNICAL SPECIFICATION PAGES

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein, except as provided in Specification 3.0.8. Upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specifications 3.0.5 ~~and~~ 3.0.6, and LCO 3.0.9

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 Specifications 3.0.5 and 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 one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

a. At least STARTUP 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 OPERATIONAL CONDITION 4 or 5.

3.0.4 When a Limiting Condition for Operation is not met, entry into an OPERATIONAL CONDITION or other specified condition in the Applicability shall only be made:

a. When the associated ACTION requirements to be entered permit continued operation in the OPERATIONAL CONDITION or other specified condition in the Applicability for an unlimited period of time; or

b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the OPERATIONAL CONDITION 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 OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements 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 the second premise of Specification 3.0.1 and is an exception to Specification 3.0.2 (i.e., to not comply with the applicable ACTION(s)) for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0.6 When a supported system Limiting Condition for Operation is not met solely due to a support system Limiting Condition for Operation not being met, the ACTIONs associated with this supported system are not required to be entered. Only the support system Limiting Condition for Operation ACTIONs are required to be entered. This is an exception to the second premise of Specification 3.0.1 and is an exception to Specification 3.0.2 (i.e., to not comply with the applicable ACTION(s)) for the supported system. In this event, an evaluation shall be performed in accordance with Specification 6.17, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate ACTIONs of the Limiting Condition for Operation 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 ACTIONs for a supported system, the applicable ACTIONs shall be entered in accordance with Specification 3.0.1.

3.0.7 Not Used

3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported Limiting Condition(s) for Operation are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system Limiting Condition(s) for Operation shall be declared not met.

INSERT 1G

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein, except as provided in Specification 3.0.8. Upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specifications 3.0.5 ~~and~~ 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 Specifications 3.0.5 and 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.

, and LCO 3.0.9

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

a. At least STARTUP 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 OPERATIONAL CONDITION 4 or 5.

3.0.4 When a Limiting Condition for Operation is not met, entry into an OPERATIONAL CONDITION or other specified condition in the Applicability shall only be made:

a. When the associated ACTION requirements to be entered permit continued operation in the OPERATIONAL CONDITION or other specified condition in the Applicability for an unlimited period of time; or

b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the OPERATIONAL CONDITION 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 OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements or that are part of a shutdown of the unit.

LIMITING CONDITION FOR OPERATION (Continued)

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 the second premise of Specification 3.0.1 and is an exception to Specification 3.0.2 (i.e., to not comply with the applicable ACTION(s)) for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

3.0.6 When a supported system Limiting Condition for Operation is not met solely due to a support system Limiting Condition for Operation not being met, the ACTIONs associated with this supported system are not required to be entered. Only the support system Limiting Condition for Operation ACTIONs are required to be entered. This is an exception to the second premise of Specification 3.0.1 and is an exception to Specification 3.0.2 (i.e., to not comply with the applicable ACTION(s)) for the supported system. In this event, an evaluation shall be performed in accordance with Specification 6.17, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate ACTIONs of the Limiting Condition for Operation 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 ACTIONs for a supported system, the applicable ACTIONs shall be entered in accordance with Specification 3.0.1.

3.0.7 Not Used

3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported Limiting Condition(s) for Operation are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system Limiting Condition(s) for Operation shall be declared not met.

INSERT 1G

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2H

Proposed Technical Specifications Changes (Mark-Ups)

Nine Mile Point Nuclear Station, Unit 1

TECHNICAL SPECIFICATION PAGES

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

3.0.1 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable LCO, provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in a condition stated in the individual specification.

In the event LCO requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in a condition consistent with the individual specification unless corrective measures are completed that permit operation for the specified time interval as measured from initial discovery or until the reactor is placedin an operational condition in which the specification is not applicable.

3.0.2 through 3.0.7 – Reserved for Future Use

3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

4.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

4.0.1 SRs shall be met during the applicable reactor operating or other specified conditions for individual LCOs, unless otherwise stated in the SR. 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 LCO. Failure to perform a surveillance within the specified frequency shall be failure to meet the LCO except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

INSERT 1H

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

INSERT 1H

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is Operable and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is Operable and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required Operable train or subsystem becomes inoperable while this specification is in use, it must be restored to Operable status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2I

Proposed Technical Specifications Changes (Mark-Ups)

Peach Bottom Atomic Power Station, Units 2 and 3

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.9

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7 ~~and~~ LCO 3.0.8.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 10 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

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

(continued)

3.0 LCO APPLICABILITY (continued)

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

INSERT 1I

, and LCO 3.0.9

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7 ~~and~~ LCO 3.0.8.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 10 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

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

(continued)

3.0 LCO APPLICABILITY (continued)

LCO 3.0.7

Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

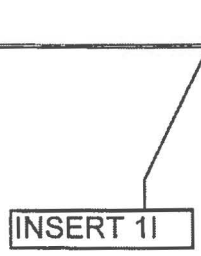
LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.



INSERT 1I

LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2J

Proposed Technical Specifications Changes (Mark-Ups)

Quad Cities Nuclear Power Station, Units 1 and 2

TECHNICAL SPECIFICATION PAGES

, and LCO 3.0.10

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 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, LCO 3.0.7, ~~and~~ LCO 3.0.8.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 3 within 13 hours; and

b. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

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

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.7 Special Operations LCOs in Section 3.10 allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with Special Operations LCOs is optional. When a Special Operations LCO is desired to be met but is not met, the ACTIONS of the Special Operations LCO shall be met. When a Special Operations LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

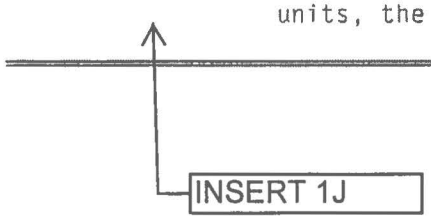
LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period, the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9 LCOs, including associated ACTIONS, shall apply to each unit individually, unless otherwise indicated. Whenever the LCO refers to a system or component that is shared by both units, the ACTIONS will apply to both units simultaneously.



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LCO 3.0.10 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

For the purposes of this specification, the High Pressure Coolant Injection system, the Reactor Core Isolation Cooling system, and the Automatic Depressurization System are considered independent subsystems of a single system.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 2K

Markup of Proposed Technical Specifications Pages (Mark-Ups)

R. E. Ginna Nuclear Power Plant

TECHNICAL SPECIFICATION PAGES

3.0 LIMITING CONDITION FOR OPERATION (LCO) AND SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

, and LCO 3.0.9

3.0 Limiting Condition For Operation (LCO) Applicability

LCO 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, LCO 3.0.7, ~~and~~ LCO 3.0.8.

LCO 3.0.2

Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

LCO 3.0.3

When an LCO is not met and (1) the associated ACTIONS are not met, (2) an associated ACTION is not provided, or (3) if directed by the associated ACTIONS, the plant shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated to place the plant, as applicable, in:

a. MODE 3 within 6 hours;

b. MODE 4 within 12 hours; and

c. MODE 5 within 36 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

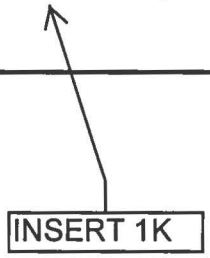
LCO 3.0.7 Test Exception LCO 3.1.8, "PHYSICS TEST Exceptions - MODE 2," allows specified Technical Specification (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. When a Test Exception LCO is desired to be met but is not met, the ACTIONS of the Test Exception LCO shall be met. When a Test Exception LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable Specifications.

LCO 3.0.8 When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or

b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.



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LCO 3.0.9 When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

Attachment 3

Proposed Technical Specifications Bases Changes (Mark-Ups)
(For Information Only)

Attachment 3A

Proposed Technical Specifications Bases Changes (Mark-Ups)

Braidwood Station, Units 1 and 2

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

9

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~ establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

BASES

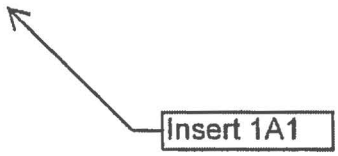
LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Exception LCOs (e.g., LCO 3.1.8, "PHYSICS TESTS Exceptions-MODE 2") allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of an Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Exception LCO, the requirements of the Exception LCO shall be followed.

LCO 3.0.8

LCO 3.0.8 establishes the applicability of each Specification to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.



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LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3B

Proposed Technical Specifications Bases Changes (Mark-Ups)

Byron Station, Units 1 and 2

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~ 9 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

BASES

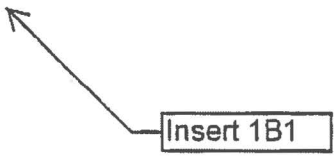
LCO 3.0.7

There are certain special tests and operations required to be performed at various times over the life of the unit. These special tests and operations are necessary to demonstrate select unit performance characteristics, to perform special maintenance activities, and to perform special evolutions. Exception LCOs (e.g., LCO 3.1.8, "PHYSICS TESTS Exceptions-MODE 2") allow specified Technical Specification (TS) requirements to be changed to permit performances of these special tests and operations, which otherwise could not be performed if required to comply with the requirements of these TS. Unless otherwise specified, all the other TS requirements remain unchanged. This will ensure all appropriate requirements of the MODE or other specified condition not directly associated with or required to be changed to perform the special test or operation will remain in effect.

The Applicability of an Exception LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Exception LCOs is optional. A special operation may be performed either under the provisions of the appropriate Exception LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Exception LCO, the requirements of the Exception LCO shall be followed.

LCO 3.0.8

LCO 3.0.8 establishes the applicability of each Specification to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.



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LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3C

Proposed Technical Specifications Bases Changes (Mark-Ups)

Clinton, Unit 1

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~ 9 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the

(continued)

BASES

LCO 3.0.8 (continued)

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (i.e., the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

LCO 3.0.8 does not apply to non-seismic functions of snubbers. The provisions of LCO 3.0.8 apply to seismic snubbers that may also have non-seismic functions provided the supported systems would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. Non-seismic snubber issues will be addressed in the corrective action program.

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INSERT 1C1

LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The Reactor Core Isolation Cooling (RCIC) system is designed to operate either automatically or manually following reactor pressure vessel (RPV) isolation accompanied by a loss of coolant flow from the feedwater system to provide adequate core cooling and control of RPV water level. Under these conditions, the High Pressure Core Spray (HPCS) and RCIC systems perform similar functions. The function of the RCIC System is to respond to transient events by providing makeup coolant to the reactor. The RCIC system is not an Engineered Safety Feature and no credit is taken in the safety analysis for RCIC System operation. The HPCS system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS subsystems provide the core cooling function in the event of failure of the HPCS system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCS system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3D

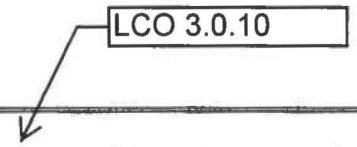
Proposed Technical Specifications Bases Changes (Mark-Ups)

Dresden Nuclear Power Station, Units 2 and 3

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES



LCOs	LCO 3.0.1 through ~~LCO 3.0.9~~ establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the

(continued)

BASES

LCO 3.0.8 (continued)

with concurrent loss of all safety system trains supported by the out-of-service snubbers).

Each use of LCO 3.0.8 requires confirmation that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation and compliance with the configuration restrictions defined above, and the associated plant configuration shall be available on a recoverable basis for NRC inspection.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (i.e., the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

LCO 3.0.8 does not apply to non-seismic functions of snubbers. The provisions of LCO 3.0.8 apply to seismic snubbers that may also have non-seismic functions provided the supported systems would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. Non-seismic snubber issues will be addressed in the corrective action program.

LCO 3.0.9

LCO 3.0.9 establishes the applicability of each Specification to both Unit 2 and Unit 3 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.

Insert 1D1

INSERT 1D1

LCO 3.0.10 LCO 3.0.10 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.10 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.10 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the

Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.10 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.10 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCI (High Pressure Coolant Injection) and IC (Isolation Condenser) are single train systems for injecting makeup water into the reactor during an accident or transient event. The IC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCI system provides backup in case of a IC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCI system during an accident. Thus, for the purposes of LCO 3.0.10, the HPCI system and the ADS are considered independent subsystems of a single system and LCO 3.0.10 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.10 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3E

Proposed Technical Specifications Bases Changes (Mark-Ups)

James A. FitzPatrick Nuclear Power Plant

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

, and 3.0.9,

BASES

LCOs

LCO 3.0.1 through LCO 3.0.7 establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.

LCO 3.0.1

LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the plant is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and

b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

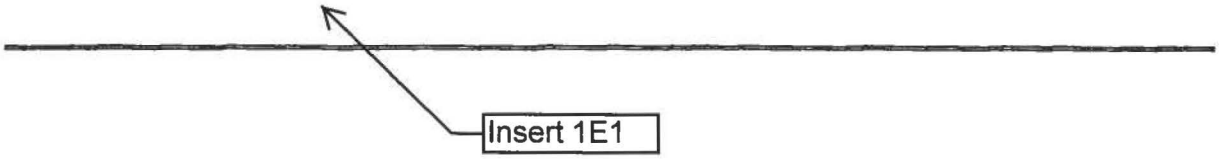
There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the plant in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the remedial measures that permit continued operation of the plant that is not further restricted by the Completion Time. In this case, compliance with the Required Actions provides an acceptable level of safety for continued operation.

(continued)

BASES

LCO 3.0.7 (continued)

The Applicability of a Special Operations LCO represents a condition not necessarily in compliance with the normal requirements of the TS. Compliance with Special Operations LCOs is optional. A special operation may be performed either under the provisions of the appropriate Special Operations LCO or under the other applicable TS requirements. If it is desired to perform the special operation under the provisions of the Special Operations LCO, the requirements of the Special Operations LCO shall be followed. When a Special Operations LCO requires another LCO to be met, only the requirements of the LCO statement are required to be met regardless of that LCO's Applicability (i.e., should the requirements of this other LCO not be met, the ACTIONS of the Special Operations LCO apply, not the ACTIONS of the other LCO). However, there are instances where the Special Operations LCO's ACTIONS may direct the other LCO's ACTIONS be met. The Surveillances of the other LCO are not required to be met, unless specified in the Special Operations LCO. If conditions exist such that the Applicability of any other LCO is met, all the other LCO's requirements (ACTIONS and SRs) are required to be met concurrent with the requirements of the Special Operations LCO.



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LCO 3.0.8 RESERVED

LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of

the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCI (High Pressure Coolant Injection) and RCIC (Reactor Core Isolation Cooling) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not an Engineered Safeguard System and no credit is taken in the safety analyses for RCIC System operation. The RCIC System is not part of the ECCS; however, the RCIC System is included with the ECCS section because of their similar functions. The RCIC System is designed to operate either automatically or manually following reactor pressure vessel (RPV) isolation accompanied by a loss of coolant flow from the feedwater system to provide adequate core cooling and control of the RPV water level. Under these conditions, the High Pressure Coolant Injection (HPCI) and RCIC systems perform similar functions. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCI system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCI system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the

existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3F

Proposed Technical Specifications Bases Changes (Mark-Ups)

LaSalle County Station, Units 1 and 2

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs	LCO 3.0.1 through LCO ~~3.0.9~~ establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering

(continued)

BASES

LCO 3.0.8 (continued)

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (i.e., the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

LCO 3.0.8 does not apply to non-seismic functions of snubbers. The provisions of LCO 3.0.8 apply to seismic snubbers that may also have non-seismic functions provided the supported systems would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. Non-seismic snubber issues will be addressed in the corrective action program.

LCO 3.0.9

LCO 3.0.9 establishes the applicability of each Specification to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.

INSERT 1F1

INSERT 1F1

LCO 3.0.10 LCO 3.0.10 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.10 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.10 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the

Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.10 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.10 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCS (High Pressure Core Spray) and RCIC (Reactor Core Isolation Cooling) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCS system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCS system during an accident. Thus, for the purposes of LCO 3.0.10, the HPCS system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.10 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.10 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3G

Proposed Technical Specifications Bases Changes (Mark-Ups)

Limerick Generating Station, Units 1 and 2

TECHNICAL SPECIFICATION BASES PAGES

3.0.9

Specifications 3.0.1 through ~~3.0.8~~ establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

> "Limiting Conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL CONDITIONS or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met. It is not intended that the shutdown ACTION requirement be used as an operational convenience which permits (routine) voluntary removal of a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in an OPERATIONAL CONDITION or other specified condition in which the specification no longer applies.

The specified time limits of the ACTION requirements are applicable from the point of time it is identified that a Limiting Condition for Operation is not met. The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the ACTION requirements are applicable when this limit expires if the surveillance has not been completed. When a shutdown is required to comply with ACTION requirements, the plant may have entered an OPERATIONAL CONDITION in which a new specification becomes applicable. In this case, the time limits of the ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

The following configuration restrictions shall be applied to the use of Specification 3.0.8:

(1) Specification 3.0.8.a can only be used if one of the following two means of heat removal is available:

a. At least one high pressure makeup path (e.g., using High Pressure Coolant Injection (HPCI) or Reactor Core Isolation Cooling (RCIC) or its equivalent) and heat removal capability (e.g., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or

b. At least one low pressure makeup path (e.g., Low Pressure Coolant Injection (LPCI) or Core Spray (CS)) and heat removal capability (e.g., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s).

(2) Specification 3.0.8.b can only be used following verification that at least one success path exists, using equipment not associated with the inoperable snubber(s), to provide makeup and core cooling needed to mitigate Loss of Offsite Power (LOOP) accident sequences (i.e., initiated by a seismically-induced LOOP event with concurrent loss of all safety system trains supported by the out-of-service snubbers).

Specification 3.0.8 only applies to the seismic function of snubbers; it does not apply to the non-seismic functions of snubbers. Therefore, each use of Specification 3.0.8 for seismic snubbers that also have non-seismic functions requires confirmation that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation and compliance with the configuration restrictions defined above, and the associated plant configuration shall be available on a recoverable basis for NRC inspection.

Specification 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (i.e., the Maintenance Rule) does not address seismic risk. However, use of Specification 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

3.0.9

BASES

Specifications 3.0.1 through ~~3.0.8~~ establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

> "Limiting Conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL CONDITIONS or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met. It is not intended that the shutdown ACTION requirement be used as an operation convenience which permits (routine) voluntary removal of a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in an OPERATIONAL CONDITION or other specified condition in which the specification no longer applies.

The specified time limits of the ACTION requirements are applicable from the point of time it is identified that a Limiting Condition for Operation is not met. The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the ACTION requirements are applicable when this limit expires if the surveillance has not been completed. When a shutdown is required to comply with ACTION requirements, the plant may have entered an OPERATIONAL CONDITION in which a new specification becomes applicable. In this case, the time limits of the ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

The following configuration restrictions shall be applied to the use of Specification 3.0.8:

(1) Specification 3.0.8.a can only be used if one of the following two means of heat removal is available:

a. At least one high pressure makeup path (e.g., using High Pressure Coolant Injection (HPCI) or Reactor Core Isolation Cooling (RCIC) or its equivalent) and heat removal capability (e.g., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or

b. At least one low pressure makeup path (e.g., Low Pressure Coolant Injection (LPCI) or Core Spray (CS)) and heat removal capability (e.g., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s).

(2) Specification 3.0.8.b can only be used following verification that at least one success path exists, using equipment not associated with the inoperable snubber(s), to provide makeup and core cooling needed to mitigate Loss of Offsite Power (LOOP) accident sequences (i.e., initiated by a seismically-induced LOOP event with concurrent loss of all safety system trains supported by the out-of-service snubbers).

Specification 3.0.8 only applies to the seismic function of snubbers; it does not apply to the non-seismic functions of snubbers. Therefore, each use of Specification 3.0.8 for seismic snubbers that also have non-seismic functions requires confirmation that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation and compliance with the configuration restrictions defined above, and the associated plant configuration shall be available on a recoverable basis for NRC inspection.

Specification 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (i.e., the Maintenance Rule) does not address seismic risk. However, use of Specification 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

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Specification 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCI and RCIC systems are single train systems for injecting makeup water into the reactor during an accident or transient event. For the purposes of LCO 3.0.9, the HPCI system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3H

Proposed Technical Specifications Bases Changes (Mark-Ups)

Nine Mile Point Nuclear Station, Unit 1

TECHNICAL SPECIFICATION BASES PAGES

LCO 3.0.8 can only be used if one of the following two means of heat removal is available (high risk configuration restrictions):

(1) At least one high pressure makeup path (e.g., High Pressure Coolant Injection) and heat removal capability (e.g., Electromagnetic Relief Valves with Containment Spray in Torus Cooling Mode, or Emergency Condensers), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s),

OR

(2) At least one low pressure makeup path (e.g., Core Spray) and heat removal capability (e.g., Electromagnetic Relief Valves with Containment Spray in Torus Cooling Mode, or Emergency Condensers, or shutdown cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s).

LCO 3.0.8.a applies when one or more snubbers are not capable of providing their associated support function(s) to a single train or subsystem of a multiple train or subsystem supported system or to a single train or subsystem supported system. LCO 3.0.8.a allows 72 hours to restore the snubber(s) before declaring the supported system inoperable. The 72 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function and due to the availability of the redundant train of the supported system.

LCO 3.0.8.b applies when one or more snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function.

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3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain Operable when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system Operability (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required Operable train or subsystem becomes inoperable, it must be restored to Operable status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3l

Proposed Technical Specifications Bases Changes (Mark-Ups)

Peach Bottom Atomic Power Station, Units 2 and 3

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

9

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~ establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the

(continued)

BASES

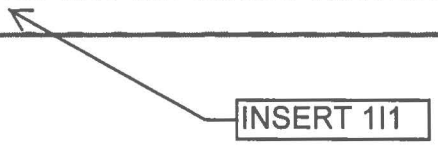
LCO 3.0.8 (continued)

Reference TRM 3.16 SNUBBERS Bases for requirements and commitments for maintaining minimum supporting equipment not associated with the inoperable snubber(s) when entering LCO 3.0.8.a or LCO 3.0.8.b.

When applying LCO 3.0.8.a or LCO 3.0.8.b one of the following two means of heat removal must be available 1) at least one high pressure makeup path (i.e., using high pressure coolant injection (HPCI) or reactor core isolation cooling (RCIC)) and heat removal capability (i.e., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or 2) at least one low pressure makeup path (i.e., low pressure coolant injection (LPCI) or core spray (CS)) and heat removal capability (i.e., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment, not associated with the inoperable snubber(s).

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Reference TRM 3.16 Bases for risk management actions used to satisfy commitments T04781 and T04782.

LCO 3.0.8 does not apply to non-seismic functions of snubbers. Prior to using LCO 3.0.8.a for seismic snubbers that may also have non-seismic functions, it must be confirmed that at least one train of each system that is supported by the inoperable snubber(s) would remain capable of performing the system's required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8.b is not to be applied to seismic snubbers that also have non-seismic functions.



B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

9

LCOs	LCO 3.0.1 through LCO 3.0.~~8~~ establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified. There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the

(continued)

BASES

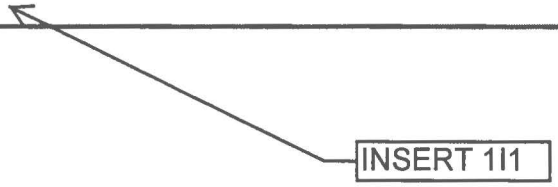
LCO 3.0.8 (continued)

Reference TRM 3.16 SNUBBERS Bases for requirements and commitments for maintaining minimum supporting equipment not associated with the inoperable snubber(s) when entering LCO 3.0.8.a or LCO 3.0.8.b.

When applying LCO 3.0.8.a or LCO 3.0.8.b one of the following two means of heat removal must be available 1) at least one high pressure makeup path (i.e., using high pressure coolant injection (HPCI) or reactor core isolation cooling (RCIC)) and heat removal capability (i.e., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or 2) at least one low pressure makeup path (i.e., low pressure coolant injection (LPCI) or core spray (CS)) and heat removal capability (i.e., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment, not associated with the inoperable snubber(s).

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more snubbers are not able to perform their associated support function. Reference TRM 3.16 Bases for risk management actions used to satisfy commitments T04781 and T04782.

LCO 3.0.8 does not apply to non-seismic functions of snubbers. Prior to using LCO 3.0.8.a for seismic snubbers that may also have non-seismic functions, it must be confirmed that at least one train of each system that is supported by the inoperable snubber(s) would remain capable of performing the system's required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8.b is not to be applied to seismic snubbers that also have non-seismic functions.



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LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCI (High Pressure Coolant Injection) and RCIC (Reactor Core Isolation Cooling) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The HPCI system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCI system during an accident. Thus, for the purposes of LCO 3.0.9, the HPCI system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.9 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3J

Proposed Technical Specifications Bases Changes (Mark-Ups)

Quad Cities Nuclear Power Station, Units 1 and 2

TECHNICAL SPECIFICATION BASES PAGES

LCO 3.0.10

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

BASES

LCOs

LCO 3.0.1 through ~~LCO 3.0.9~~ establish the general requirements applicable to all Specifications in Sections 3.1 through 3.10 and apply at all times, unless otherwise stated.

LCO 3.0.1

LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the unit is in the MODES or other specified conditions of the Applicability statement of each Specification).

LCO 3.0.2

LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that:

a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and

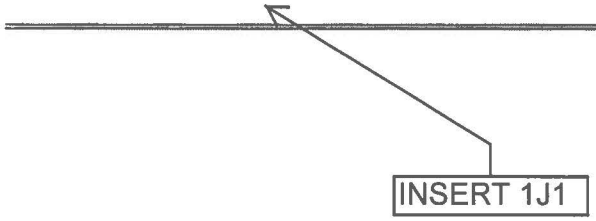
b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

There are two basic types of Required Actions. The first type of Required Action specifies a time limit in which the LCO must be met. This time limit is the Completion Time to restore an inoperable system or component to OPERABLE status or to restore variables to within specified limits. If this type of Required Action is not completed within the specified Completion Time, a shutdown may be required to place the unit in a MODE or condition in which the Specification is not applicable. (Whether stated as a Required Action or not, correction of the entered Condition is an action that may always be considered upon entering ACTIONS.) The second type of Required Action specifies the

(continued)

BASES (continued)

LCO 3.0.9 LCO 3.0.9 establishes the applicability of each Specification to both Unit 1 and Unit 2 operation. Whenever a requirement applies to only one unit, or is different for each unit, this will be identified in the appropriate section of the Specification (e.g., Applicability, Surveillance, etc.) with parenthetical reference, Notes, or other appropriate presentation within the body of the requirement.



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LCO 3.0.10 LCO 3.0.10 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.10 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.10 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the

Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions, and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.10 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.10 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

The HPCI (High Pressure Coolant Injection) and RCIC (Reactor Core Isolation Cooling) systems are single train systems for injecting makeup water into the reactor during an accident or transient event. The RCIC system is not a safety system, nor required to operate during a transient, therefore, it does not have to meet the single failure criterion. The HPCI system provides backup in case of a RCIC system failure. The ADS (Automatic Depressurization System) and low pressure ECCS coolant injection provide the core cooling function in the event of failure of the HPCI system during an accident. Thus, for the purposes of LCO 3.0.10, the HPCI system, the RCIC system, and the ADS are considered independent subsystems of a single system and LCO 3.0.10 can be used on these single train systems in a manner similar to multiple train or subsystem systems.

If during the time that LCO 3.0.10 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 3K

Proposed Technical Specifications Bases Changes (Mark-Ups)

R. E. Ginna Nuclear Power Plant

TECHNICAL SPECIFICATION BASES PAGES

B 3.0 LIMITING CONDITION FOR OPERATION (LCO) AND SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

B 3.0 Limiting Condition For Operation (LCO) Applicability

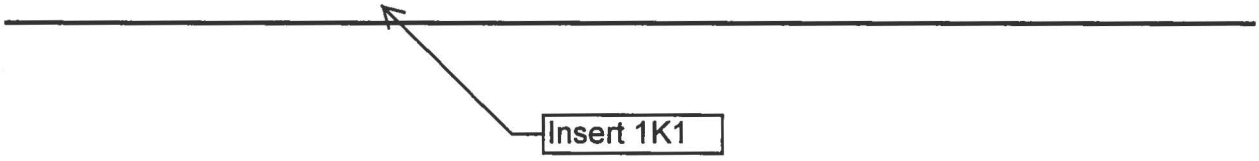
BASES

9

LCOs	LCO 3.0.1 through LCO 3.0.8 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.
LCO 3.0.1	LCO 3.0.1 establishes the Applicability statement within each individual Specification as the requirement for when the LCO is required to be met (i.e., when the plant is in the MODES or other specified conditions of the Applicability statement of each Specification).
LCO 3.0.2	LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met. The Completion Time of each Required Action for an ACTIONS Condition is applicable from the point in time that an ACTIONS Condition is entered, unless otherwise specified. The Required Actions establish those remedial measures that must be taken within specified Completion Times when the requirements of an LCO are not met. This Specification establishes that: a. Completion of the Required Actions within the specified Completion Times constitutes compliance with a Specification; and b. Completion of the Required Actions is not required when an LCO is met within the specified Completion Time, unless otherwise specified.

LCO 3.0.8.b applies when one or more seismic snubbers are not capable of providing their associated support function(s) to more than one train or subsystem of a multiple train or subsystem supported system. LCO 3.0.8.b allows 12 hours to restore the snubber(s) before declaring the supported system inoperable. The 12 hour Completion Time is reasonable based on the low probability of a seismic event concurrent with an event that would require operation of the supported system occurring while the snubber(s) are not capable of performing their associated support function.

LCO 3.0.8 requires that risk be assessed and managed. Industry and NRC guidance on the implementation of 10 CFR 50.65(a)(4) (the Maintenance Rule) does not address seismic risk. However, use of LCO 3.0.8 should be considered with respect to other plant maintenance activities, and integrated into the existing Maintenance Rule process to the extent possible so that maintenance on any unaffected train or subsystem is properly controlled, and emergent issues are properly addressed. The risk assessment need not be quantified, but may be a qualitative awareness of the vulnerability of systems and components when one or more seismic snubbers are not able to perform their associated support function.



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LCO 3.0.9 LCO 3.0.9 establishes conditions under which systems described in the Technical Specifications are considered to remain OPERABLE when required barriers are not capable of providing their related support function(s).

Barriers are doors, walls, floor plugs, curbs, hatches, installed structures or components, or other devices, not explicitly described in Technical Specifications, that support the performance of the safety function of systems described in the Technical Specifications. This LCO states that the supported system is not considered to be inoperable solely due to required barriers not capable of performing their related support function(s) under the described conditions. LCO 3.0.9 allows 30 days before declaring the supported system(s) inoperable and the LCO(s) associated with the supported system(s) not met. A maximum time is placed on each use of this allowance to ensure that as required barriers are found or are otherwise made unavailable, they are restored. However, the allowable duration may be less than the specified maximum time based on the risk assessment.

If the allowed time expires and the barriers are unable to perform their related support function(s), the supported system's LCO(s) must be declared not met and the Conditions and Required Actions entered in accordance with LCO 3.0.2.

This provision does not apply to barriers which support ventilation systems or to fire barriers. The Technical Specifications for ventilation systems provide specific Conditions for inoperable barriers. Fire barriers are addressed by other regulatory requirements and associated plant programs. This provision does not apply to barriers which are not required to support system OPERABILITY (see NRC Regulatory Issue Summary 2001-09, "Control of Hazard Barriers," dated April 2, 2001).

The provisions of LCO 3.0.9 are justified because of the low risk associated with required barriers not being capable of performing their related support function. This provision is based on consideration of the following initiating event categories:

- Loss of coolant accidents;
- High energy line breaks;
- Feedwater line breaks;
- Internal flooding;
- External flooding;
- Turbine missile ejection; and
- Tornado or high wind.

The risk impact of the barriers which cannot perform their related support function(s) must be addressed pursuant to the risk assessment and management provision of the Maintenance Rule, 10 CFR 50.65 (a)(4), and the associated implementation guidance, Regulatory Guide 1.160, "Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." Regulatory Guide 1.160 endorses the guidance in Section 11 of NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants." This guidance provides for the consideration of dynamic plant configuration issues, emergent conditions,

and other aspects pertinent to plant operation with the barriers unable to perform their related support function(s). These considerations may result in risk management and other compensatory actions being required during the period that barriers are unable to perform their related support function(s).

LCO 3.0.9 may be applied to one or more trains or subsystems of a system supported by barriers that cannot provide their related support function(s), provided that risk is assessed and managed (including consideration of the effects on Large Early Release and from external events). If applied concurrently to more than one train or subsystem of a multiple train or subsystem supported system, the barriers supporting each of these trains or subsystems must provide their related support function(s) for different categories of initiating events. For example, LCO 3.0.9 may be applied for up to 30 days for more than one train of a multiple train supported system if the affected barrier for one train protects against internal flooding and the affected barrier for the other train protects against tornado missiles. In this example, the affected barrier may be the same physical barrier but serve different protection functions for each train.

If during the time that LCO 3.0.9 is being used, the required OPERABLE train or subsystem becomes inoperable, it must be restored to OPERABLE status within 24 hours. Otherwise, the train(s) or subsystem(s) supported by barriers that cannot perform their related support function(s) must be declared inoperable and the associated LCOs declared not met. This 24 hour period provides time to respond to emergent conditions that would otherwise likely lead to entry into LCO 3.0.3 and a rapid plant shutdown, which is not justified given the low probability of an initiating event which would require the barrier(s) not capable of performing their related support function(s). During this 24 hour period, the plant risk associated with the existing conditions is assessed and managed in accordance with 10 CFR 50.65(a)(4).

Attachment 4
Summary of Commitments

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	Programmatic (Yes/No)
1. EGC commits to the guidance of NUMARC 93-01 Section 11, which provides guidance and details on the assessment and management of risk during maintenance.	120 days following approval.	No	Yes
2. EGC will revise procedures to ensure that the risk assessment and management process described in NEI 04-08 is used whenever a barrier is considered unavailable and the requirements of LCO 3.0.9, or its equivalent, are to be applied, in accordance with an overall configuration risk management program (CRMP) to ensure that potentially risk-significant configurations resulting from maintenance and other operational activities are identified and avoided.	120 days following approval.	No	Yes