

PROPOSED TECHNICAL SPECIFICATION CHANGES

Specification 4.0.2

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APPLICABILITYSURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

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

~~a. A maximum allowable extension not to exceed 25% of the surveillance interval, but~~

~~b. The combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.~~

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual specifications. Surveillance Requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

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

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i);

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3.0.4 This specification provides that entry into an OPERATIONAL MODE or other specified applicability condition must be made with: (1) the full complement of required systems, equipment, or components OPERABLE and (2) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out-of-service provisions contained in the ACTION statements.

The intent of this provision is to ensure that facility operation is not initiated with either required equipment or systems inoperable or other specified limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL MODES or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL MODES or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

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4.0.2 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide operational flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency does not negate this allowable tolerance value and permits the performance of more frequent surveillance activities.

The tolerance values, taken either individually or consecutively over three test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under these criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements. Items may be determined inoperable during use, during surveillance tests or in accordance with this specification. Therefore, ACTION statements are entered when the Surveillance Requirements should have been performed rather than at the time it is discovered that the tests were not performed.

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This <sup>Surveillance</sup> specification ~~4.0.2~~ establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a ~~12-~~an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Note: The above writeup for Bases 4.0.2 comes from Generic Letter 87-09, the underlined wording signifies portions that were changed in Generic Letter 89-14.