

APPLICABILITY

LIMITING CONDITION FOR OPERATION

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

This specification is not applicable in MODES 5 or 6.

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable 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:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the **OPERABILITY** requirements for a Limiting Condition for Operation. The time limits of the **ACTION** requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. However, this time of applicability may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the **ACTION** requirements are less than 24 hours. 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. This provision shall not prevent passage through or to **OPERATIONAL MODES** as required to comply with **ACTION** requirements.

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

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CALVERT CLIFFS - UNIT 2

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SURVEILLANCE REQUIREMENTS (Continued)

- 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 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semi-annually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

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mean that for one division the emergency power source must be **OPERABLE** (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be **OPERABLE** or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source **OPERABLE**). In other words, both emergency power sources must be **OPERABLE** and all redundant systems, subsystems, trains, components and devices in both divisions must also be **OPERABLE**. If these conditions are not satisfied, action is required in accordance with this specification.

In **MODES 5** or **6** Specification 3.0.5 is not applicable, and thus the individual **ACTION** statements for each applicable Limiting Condition for Operation in these **MODES** must be adhered to.

4.0.1 This specification provides that surveillance activities necessary to insure 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.

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 3 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 This specification establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the **OPERABILITY** requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be **OPERABLE** when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are **OPERABLE** when they are found or known to be inoperable although still meeting the Surveillance Requirements.

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This specification also clarifies that the **ACTION** requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the **ACTION** requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded.

Completion of the Surveillance Requirement within the allowable time limits of the **ACTION** requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the **OPERABILITY** requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable time limits of the **ACTION** requirements are less than 24 hours or a shutdown is required to comply with **ACTION** requirements, e.g., Specification 3.0.3, a 24-hour allowance is provided to permit a delay in implementing the **ACTION** requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown is required to comply with **ACTION** requirements or before other remedial measures would be required that may preclude completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, and the time required to perform the surveillance.

This time limit provision also provides for the completion of Surveillance Requirements that become applicable as a consequence of **MODE** changes imposed by **ACTION** requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the **ACTION** requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the **ACTION** requirements are applicable at the time that the surveillance is terminated.

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

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

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

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

4.0.5 This specification ensures that 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 will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55 a. Relief from any of the above requirements has been provided in writing by the Commission and is not a part of these Technical Specifications.

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

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. For example, the requirements of Specification 4.0.4 to perform surveillance activities prior to entry into an **OPERATIONAL MODE** or other specified applicability condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows pumps to be tested up to one week after return to normal operation. And for example, the Technical Specification definition of **OPERABLE** does not grant a grace period before a device that is not capable of performing its specified function is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

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