

ATTACHMENT A

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3.0 SURVEILLANCE REQUIREMENTS

3.0.1 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 three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

3.0.2 The surveillance intervals are defined as follows:

Notation	Title	Frequency
S	Shift	At least once per 8 hours
D	Daily	At least once per 24 hours
W	Weekly	At least once per 7 days
BW	Biweekly	At least once per 14 days
M	Monthly	At least once per 31 days
Q	Quarterly	At least once per 92 days
SA	Semiannual	At least once per 184 days
A	Annually	At least once per 366 days
R	Refueling	At least once per plant operating cycle
P	Start up	Prior to Reactor Start up, if not completed in the previous week.

Exception to these intervals are stated in the individual Specifications.

3.0.3 The provisions of Specifications 3.0.1 and 3.0.2 are applicable to all codes and standards referenced within the Technical Specifications. The requirements of the Technical Specifications shall have precedence over the requirements of the codes and standards referenced within the Technical Specifications.

3.0.4 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specifications 3.0.1 and 3.0.2, shall constitute noncompliance with the OPERABILITY requirements for the corresponding 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. The ACTION requirements 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.

3.0 SURVEILLANCE REQUIREMENTS

BASIS

Specifications 3.0.1 through 3.0.4 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

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

Specification 3.0.1 established the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. 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. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 3.0.1 are 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. These provisions are sufficient to ensure that the reliability demonstrated through actual surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

The provisions of Specification 3.0.2 define the surveillance intervals for use in the Technical Specifications. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications. A few surveillance requirements have uncommon intervals, for example, Table 3-9 requires sampling of fish once per season. In such a case the surveillance interval shall be performed as defined by the individual specifications.

Specification 3.0.3 extends the testing interval required by codes and standards referenced by the Technical Specifications. This clarification is provided 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 codes and standards referenced therein.

Specification 3.0.4 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, as defined by the provisions of Specifications 3.0.1 and 3.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for the corresponding Limiting Condition for Operation. Under the provisions

3.0 SURVEILLANCE REQUIREMENTS

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

3.0.2 The surveillance intervals are defined as follows:

<u>Notation</u>	<u>Title</u>	<u>Frequency</u>
S	Shift	At least once per 8 hours
D	Daily	At least once per 24 hours
W	Weekly	At least once per 7 days
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M	Monthly	At least once per 31 days
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SA	Semiannual	At least once per 184 days
A	Annually	At least once per 366 days
R	Refueling	At least once per plant operating cycle
P	Startup	Prior to Reactor Startup, if not completed in the previous week.

Exception to these intervals are stated in the individual Specifications.

3.0.3 The provisions of Specifications 3.0.1 and 3.0.2 are applicable to all codes and standards referenced within the Technical Specifications. The requirements of the Technical Specifications shall have precedence over the requirements of the codes and standards referenced within the Technical Specifications.

3.0.4 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specifications 3.0.1 and 3.0.2, shall constitute noncompliance with the OPERABILITY requirements for the corresponding 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. The ACTION requirements 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.

3.0 SURVEILLANCE REQUIREMENTS

BASIS

Specifications 3.0.1 through 3.0.4 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Requirements, 10 CFR 50.36(c)(3):

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

Specification 3.0.1 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 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 surveillance that are not performed during refueling outages. The limitation of Specification 3.0.1 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. 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.

The provisions of Specification 3.0.2 define the surveillance intervals for use in the Technical Specifications. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications. A few surveillance requirements have uncommon intervals, for example, Table 3-9 requires sampling of fish once per season. In such a case the surveillance interval shall be performed as defined by the individual specifications.

Specification 3.0.3 extends the testing interval required by codes and standards referenced by the Technical Specifications. This clarification is provided 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 codes and standards referenced therein.

Specification 3.0.4 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, as defined by the provisions of Specifications 3.0.1 and 3.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for the corresponding Limiting Condition for Operation. Under the provisions

ATTACHMENT B

DESCRIPTION, JUSTIFICATION AND
NO SIGNIFICANT HAZARDS CONSIDERATION

Description of amendment request:

The proposed amendment requests deletion of the 3.25 surveillance limit from the Technical Specification 3.0.1 as recommended in the NRC Generic Letter 89-14, August 21, 1989. Presently, Specification 3.0.1 allows 1.25 and 3.25 extension on all surveillance test performances. The 3.25 factor limits extending surveillances so that the combined time interval for any three surveillances will not exceed 3.25 times the specified interval. The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent. OPPD accepts the NRC staff considerations and conclusion that removal of the 3.25 factor will have an overall positive impact on safety when applied to Fort Calhoun Station.

Basis for No Significant Hazards Consideration:

The proposed change does not involve significant hazards consideration because the operation of Fort Calhoun Station in accordance with this amendment would not:

1. involve a significant increase in the probability or consequence of an accident previously evaluated. The 25 percent extension has been evaluated as a reasonable time limit to facilitate the scheduling of surveillance activities and allow surveillances to be postponed when plant conditions are not suitable for conducting a surveillance. The 25 percent is maintained by the 1.25 limit and will not significantly increase the probability or consequences of an accident.
2. create the possibility of a new or different kind of accident from any previously analyzed. The proposed change does not alter the Updated Safety Analysis Report in which the accidents were previously analyzed and will not create the possibility of a new or different kind of accidents.
3. involve a significant reduction in a margin of safety. The surveillance intervals in determining operability of the plant equipment/systems are not changed and deletion of 3.25 limit will not reduce the margin of safety.

Therefore, based on the above considerations, Omaha Public Power District has determined that the proposed change does not involve significant hazards.